Docket #0868 Date Filed: 04/27/2026

SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION. CLAIMANTS RECEIVING THIS OBJECTION SHOULD REVIEW IT TO SEE IF THEIR NAMES APPEAR ON THE SCHEDULES ATTACHED HERETO TO DETERMINE WHETHER THE OBJECTION AFFECTS THEIR CLAIMS. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT TRUSTEE'S COUNSEL, HALPERIN BATTAGLIA BENZIJA, LLP, ATTENTION LIGEE GU, AT 212-765-9100 EXT. 108 OR BY EMAIL AT LGU@HALPERINLAW.NET

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
NVN Liquidation, Inc. f/k/a NOVAN, Inc., *et al*.,[1]	Case No. 23-10937 (LSS)
Debtors.	(Jointly Administered)
	Hearing Date: May 27, 2026 at 3:00 pm. **Obj. Deadline: May 20, 2026 at 4:00 p.m.**

TRUSTEE'S SEVENTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)
(No Liability, Overstated, and Misclassified Claims)

Alan D. Halperin, solely in his capacity as liquidating trustee (the "Trustee") of the NVN Liquidation, Inc. Liquidating Trust (the "Trust") as successor in interest to the remaining assets of NVN Liquidation, Inc. f/k/a Novan, Inc. and EPI Health, LLC (collectively, the "Debtors"), by and through his undersigned counsel, hereby files this Seventh Omnibus Objection to Claims (Substantive) (the "Objection"), pursuant to §§ 105(a), 502, 503 and 507 of title 11 of the United States Code (the "Bankruptcy Code"), Rules 3007(d) and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), seeking entry of an order substantially in the form attached hereto as **Exhibit A** (the "Proposed

[1] The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification number, are: NVN Liquidation, Inc. (f/k/a Novan, Inc.) (7682) and EPI Health, LLC (9118).

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Order"): (a) disallowing and expunging claims identified on **Schedule 1** attached to the Proposed Order in their entirety (the "No Liability Claims"), (b) reducing claims identified on **Schedule 2** attached to the Proposed Order to reflect the amounts indicated thereon (the "Overstated Claims") and (c) reclassifying certain claim identified on **Schedule 3** attached to the Proposed Order in their entirety (the "Misclassified Claims"). In support of this Objection, the Trustee submits the *Declaration of Alan Halperin Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Support of the Trustee's Seventh Omnibus Objection to Claims (Substantive)* (the "Declaration") attached hereto as **Exhibit B**. In further support of this Objection, the Trustee respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (this "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. The Trustee confirms his consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this Objection to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein are §§ 105(a), 502, 503 and 507 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9014 and Rule 3007-1 of the Local Rules.

BACKGROUND

3. On July 17, 2023 (the "Petition Date"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in this Court. The Debtors' bankruptcy cases are jointly administered under Case No. 23-10937 (these "Cases").

4. On July 19, 2023, the Court entered an order authorizing and approving the retention of Kurtzman Carson Consultants, LLC, now doing business as Verita Global, as claims and noticing agent (the "Claims Agent") in these Cases [Docket No. 35] to, among other things, maintain the official claims register for the Debtors (the "Claims Register").

5. Pursuant to an order entered on September 20, 2023 [Docket No. 304] (the "Bar Date Order"), this Court established (a) October 25, 2023 at 5:00 p.m. (the "General Bar Date") as the deadline for all non-governmental entities and persons to file proofs of claims against the Debtors and their estates that arose prior to the Petition Date (including secured claims, unsecured priority claims, unsecured non-priority claims, and claims arising under section 503(b)(9) of the Bankruptcy Code), and (b) January 16, 2024 as the deadline for governmental entities to file any such pre-petition claims against the Debtors (the "Governmental Bar Date"). In accordance with the Bar Date Order, the Claims Agent served a *Notice of Bar Dates for Filing Proofs of Claim Against the Debtors* [Docket No. 318] upon all known creditors of the Debtors [Docket Nos. 358 and 387]. Additionally, in accordance with the Bar Date Order, notice of the Bar Dates was published in USA TODAY [Docket No. 330]. Additionally, pursuant to the *Notice of (I) Confirmation Order; (II) Effective Date; (III) Applicable Bar Dates for Filing Certain Claims; and (IV) Related Information* [Docket No. 677], a deadline of May 30, 2024 at 5:00 p.m. (the "Administrative Bar Date, together with the General Bar Date and the Governmental Bar Date, collectively, the "Bar Dates") was set for all requests for allowance and/or payment of Administrative Expense Claims incurred on or after the Petition Date, through and including the Effective Date.

6. During the pendency of the Cases, the Debtors sold or abandoned substantially all of their operating assets, ceased business operations and terminated all of its employees in the third quarter of 2023.

7. On January 26, 2024 (the "Confirmation Date"), this Court entered an *Order (I) Approving Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation Proposed by the Debtors as Containing Adequate Information on a Final Basis and (II) Confirming Combined Disclosure Statement and Chapter 11 Plan of Liquidation Proposed by the Debtors* [Docket No. 568] (the "Confirmation Order") confirming the *Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation Proposed by the Debtors* dated January 26, 2024 [Docket No. 568-1], together with the Plan Supplement [Docket No. 522] and the amendment thereto [Docket No. 543], (collectively, as amended, supplemented, or otherwise modified, the "Plan"). The Plan became effective on April 30, 2024 (the "Effective Date") [Docket No. 677].

8. On the Effective Date, in accordance with the Confirmation Order, the Plan and the *NVN Liquidating Trust Agreement* (the "Trust Agreement"), the Trust was established, and the Trustee was appointed as Trustee of the Trust and the duly appointed representative of each of the Debtors and their estates with all rights and powers of a trustee under the Bankruptcy Code.

9. In accordance with the Plan and the Trust Agreement, from and after the Effective Date, the Trustee is empowered to, among other things, object to, compromise, and/or settle any claims against the Debtors.

10. Pursuant to the Plan, the Trustee's deadline to object to claims is one (1) year after the Effective Date (*i.e*. April 30, 2025). By the most recent *Order Granting Motion of the Trustee for Entry of an Order Pursuant to Bankruptcy Code Sections 105(a) and Bankruptcy Rule 9006 Extending the Period Within Which the Trustee May Object to all Claims* [Docket No. 864], the current deadline to object to all claims is April 30, 2027.

11. In the ordinary course of their business, the Debtors maintained books and records that reflected the nature and amounts of the Debtors' obligations to creditors, as well as payments made on account of such obligations (the "Books and Records").

RELIEF REQUESTED

12. By this Objection, and for the reasons set forth more fully below, the Trustee objects to No Liability, Overstated, and Misclassified Claims (collectively, the "Subject Claims") pursuant to §§ 105(a), 502, 503 and 507 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9014, and Local Rule 3007-1 and requests entry of the Proposed Order reducing, disallowing and/or expunging each of the Subject Claims as reflected in **Schedules 1 , 2, and 3** to the Proposed Order.

OBJECTION TO CLAIMS

13. As set forth in the Declaration, the Trustee's professionals examined the Subject Claims, all supporting documentation provided by the claimants, if any, and the Books and Records and have identified the Subject Claims as No Liability, Overstated, and Misclassified Claims are inconsistent with the Books and Records and should be disallowed and expunged and/or reduced and modified.

14. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and hearing, shall determine the allowed amount of the claim. 11 U.S.C. § 502(b).

15. When asserting a proof of claim against a bankruptcy estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *In re Allegheny Int'l, Inc*., 954 F.2d 167, 173 (3d Cir. 1992); *Matter of Int'l Match Corp.,* 69 F.2d 73, 76 (2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where a claimant alleges sufficient facts to support its claim, its claim is afforded prima facie validity. *In re Allegheny Int'l, Inc.,* 954 F.2d at 173. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim's prima facie validity. *Id*. In practice, the objecting party must produce evidence that would refute at least one of the allegations

essential to the claim's legal sufficiency. *Id*. Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id*. The burden of persuasion is always on the claimant. *Id.*

A. No Liability Claims

16. The Trustee objects to the No Liability Claims listed in **Schedule 1** to the Proposed Order as it consist of a claim that have no basis in fact or law that would support the liability asserted. Based on the Trustee's professionals' review of the proofs of claim and supporting documentation, if any, provided by the claimant, as well as the Books and Records, there is no basis for liability.

17. Therefore the Trustee objects to the No Liability Claims and seeks an order disallowing and expunging these claims in their entirety as reflected in **Schedule 1** to the Proposed Order. The more particular basis for each individual disallowance is set forth in **Schedule 1** to the Proposed Order under the column "Reason for Disallowance". Failure to disallow the No Liability Claims will result in the holders of such claims receiving a recovery to which they are not entitled.

B. Overstated Claims

18. The Trustee objects to the Overstated Claims identified on **Schedule 2** because such claims overstate the amount of liability owed by the Debtors as compared to the Books and Records, and/or because such claims fail to include sufficient documentation to support the full amount asserted. The more particular basis for each individual reduction is set forth in **Schedule 2** to the Proposed Order under the column "Reason for Modification." After reviewing each Overstated Claim, together with the Books and Records, the Trustee determined that the amount of each Reduced Claim should be reduced as reflected on **Schedule 2**. Failure to modify the Overstated Claims will result in holders of such claims receiving larger recoveries than they are entitled to from the Trust.

C. Misclassified Claim

19. The Trustee objects to the Misclassified Claim identified on **Schedule 3** to the Proposed Order as they improperly assert a secured and administrative claim amounts (and unliquidated claim) without establishing a basis. Based on the Books and Records and the claim itself, there is no basis for the secured or administrative claim and is not otherwise supported under the Bankruptcy Code and/or Plan. Thus, the Trustee seeks to reclassify and modified the Misclassified Claim solely as a general unsecured claim accordingly.

RESPONS TO OBJECTIONS

20. Any holder of any of the Subject Claims who wants to contest this Objection must file and serve a written response to this Objection (a "Response") so that it is received no later than **4:00 p.m. (Prevailing Eastern Time) on May 20, 2026** (the "Response Deadline"). **The Proposed Order and the attached Schedules should be read carefully.**

21. Every Response should be filed with the Office of the Clerk, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon counsel for the Trustee so that the Response is received no later than the Response Deadline at the following address:

Halperin Battaglia Benzija, LLP
40 Wall Street, 37th Floor
New York, New York 10005
Attention: Ligee Gu, Esq.
lgu@halperinlaw.net

-and-

Womble Bond Dickinson (US) LLP
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Attention: Donald J. Detweiler, Esq.
Donald.detweiler@wbd-us.com

-and-

Womble Bond Dickinson (US) LLP
950 Third Avenue, Suite 2400
New York, New York 10022
Attention: Edward L. Schnitzer, Esq.
edward.schnitzer@wbd-us.com

22. Content of Responses. Every Response to this Objection must contain, at a minimum, the following:

(a) a caption setting forth the name of the Court, the name of the Debtors, the case number and the title of this Objection to which the Response is directed;

(b) the name of the claimant and description of the basis for the Subject Claims, as applicable;

(c) a concise statement setting forth the reasons why the relief in this Objection should not be granted, including, but not limited to, the specific factual and legal bases upon which the claimant relies in opposing this Objection;

(d) all documentation or other evidence supporting the disputed claim not previously filed with the Court or the Claims Agent, upon which the claimant relies in opposing this Objection; and

(e) the name, address, telephone number, email and fax number of the person(s) (which may be the claimant or a legal representative thereof) to whom counsel for the Trustee should serve a reply, if any, to the Response and who possesses authority to reconcile, settle or otherwise resolve the objection to the claim on behalf of the claimant.

23. If a claimant fails to file and serve a timely Response, without further notice to the claimant or a hearing, the Trustee will present to the Court an order, substantially in the form of the Proposed Order.

NOTICE

24. A copy of this Objection and all related exhibits will be served on (i) the Office of the United States Trustee for the District of Delaware; (ii) each holder of the Subject Claims; and (iii) all other parties entitled to notice in the Cases. The Trustee respectfully submits that no further notice of this Objection is required.

25. Pursuant to Bankruptcy Rule 3007, the Trustee has provided all claimants affected by this Objection with at least thirty (30) days' notice of the hearing to consider this Objection.

NO PRIOR REQUEST

26. No previous request for the relief sought herein has been made to this or any other Court.

STATEMENT OF COMPLIANCE WITH LOCAL RULE 3007-1

27. To the extent that a response is filed regarding any Claim listed in this Objection and the Trustee is unable to resolve the response, each such Claim, and the objection by the Trust 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

28. The Trustee hereby reserves the right to object in the future to any of the claims listed in this Objection on any ground in accordance with Local Rule 3007-1, and to amend, modify, and/or supplement this Objection, including, without limitation, to object to amended or newly filed proofs of claim. Separate notice and hearing may be scheduled for any such objection.

WHEREFORE the Trustee respectfully requests entry of an order substantially in the form of the Proposed Order attached hereto as **Exhibit A** granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: April 27, 2026
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Donald J. Detweiler
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Counsel to the Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
NVN Liquidation, Inc. f/k/a NOVAN, Inc., *et al*.,[1]	Case No. 23-10937 (LSS)
Debtors.	(Jointly Administered)
	Hearing Date: May 27, 2026 at 3:00 p.m. **Obj. Deadline: May 20, 2026 at 4:00 p.m.**

NOTICE OF TRUSTEE'S SEVENTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE) NO LIABILITY, OVERSTATED, AND MISCLASSIFIED CLAIMS)

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM. SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED.

PLEASE TAKE NOTICE that, Alan D. Halperin, solely in his capacity as liquidating trustee (the "Trustee") of the NVN Liquidation, Inc. Liquidating Trust (the "Trust") as successor in interest to the remaining assets of NVN Liquidation, Inc. f/k/a Novan, Inc. and EPI Health, LLC (collectively, the "Debtors"), by and through his undersigned counsel, filed the attached *Trustee's Seventh Omnibus Objection to Claims (Substantive) (No Liability, Overstated, and Misclassified Claims)* (the "Seventh Omnibus Objection") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that responses ("Responses"), if any, to Seventh Omnibus Objection must be in writing, filed with the Court at 824 North Market Street, Wilmington, Delaware 19801, and served so that it is *actually received* by the undersigned counsel to the Trustee on or before **May 20, 2026 at 4:00 p.m. (Prevailing Eastern Time)**. Every

[1] The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification number, are: NVN Liquidation, Inc. (f/k/a Novan, Inc.) (7682) and EPI Health, LLC (9118).

Response to the Seventh Omnibus Objection must contain, at a minimum, the following information:

1. a caption setting forth the name of the Court, the name of the Debtors, the case number, and the title of objection to which the Response is directed;

2. the name of the claimant, his/her/its claim number, and a description of the basis for the amount of the claim;

3. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Seventh Omnibus Objection;

4. any supporting documentation, to the extent it was not included with the proof of claim previously filed with the clerk or claims agent, upon which the party will rely to support the basis for, and amounts asserted in, the proof of claim; and

5. 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 Trustee should communicate with respect to the claim or the Seventh Omnibus Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE that if no Response to the Seventh Omnibus Objection is timely filed, served, and received in accordance with the above procedures, an order may be entered granting the relief requested in the Seventh Omnibus Objection without further notice or hearing. If a Response to the Seventh Omnibus Objection is timely filed, served and received in accordance with the above procedures, a hearing on the Seventh Omnibus Objection and the Response will be held before the Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom #2, Wilmington, Delaware 19801, on **May 27, 2026 at 3:00 p.m. (Prevailing Eastern Time)** (the "Hearing"). Only a Response made in writing and timely filed and received will be considered by the Court at the Hearing.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE SEVENTH OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 27, 2026
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Donald J. Detweiler
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Counsel to the Trustee

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:	Chapter 11
NVN Liquidation, Inc. f/k/a NOVAN, Inc., *et al*.,[1]	Case No. 23-10937 (LSS)
Debtors.	(Jointly Administered)
	Re: Docket No. ___

ORDER GRANTING TRUSTEE'S SEVENTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)
(No Liability, Overstated, and Misclassified Claims)

Upon the *Trustee's Seventh Omnibus Objection to Claims* (the "Objection") seeking entry of an order reclassifying, disallowing and/or expunging the claims (collectively, the "Subject Claims") set forth on **Schedules 1, 2, and 3** attached hereto and made a part hereof (the "Schedules"), all as more fully set forth in the Objection; and upon the *Declaration of Alan D. Halperin Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Support of Trustee's Seventh Omnibus Objection to Claims (Substantive)* filed contemporaneously with the Objection and in support thereof; and this Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and no other or further notice being required; and the Court having considered all responses to the Objection, if any, and all such responses having been either overruled or withdrawn; and upon all proceedings had before the Court; and the Court having

[1] The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification number, are: NVN Liquidation, Inc. (f/k/a Novan, Inc.) (7682) and EPI Health, LLC (9118).

determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and

This Court having **FOUND AND DETERMINED THAT:**

A. The holders of the Subject Claims listed on the Schedules were properly and timely served with a copy of the Objection and all of its accompanying exhibits, schedules and notice of hearing on the Objection and response deadline.

B. Any entity known to have an interest in the Subject Claims has been afforded reasonable opportunity to respond to, or being heard regarding, the relief requested in the Objection, and

C. The relief requested in the Objection is the in the best interests of the Debtors, their estates, the Trust[2] and its beneficiaries, and other parties in interest;

And after due deliberation and sufficient cause appearing therefor,

IT IS THEREFORE ORDERED THAT:

1. The Objection is GRANTED.

2. The No Liability Claims listed on **Schedule 1** are hereby disallowed and expunged in their entirety.

3. The Overstated Claims listed on **Schedule 2** are hereby reduced as reflected on **Schedule 2**.

4. The Misclassified Claim on **Schedule 3** is hereby reclassified and modified as a general unsecured claim as reflected on **Schedule 3**.

[2] Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

5. The Claims Agent is hereby authorized and directed to reclassify, disallow and/or expunge the Subject Claims on the Claims Register as reflected in and consistent with this Order and to make other changes to the Claims Register as necessary to effectuate the terms of this Order.

6. The Objection to each of the Subject Claims constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each of the Subject Claims. Any stay of this Order pending appeal by any holder of any of the Subject Claims shall apply only to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to other contested matters covered hereby.

7. Nothing in the Objection or this Order shall be construed as an allowance of any of the Subject Claims or any other claims.

8. The Trustee's right to amend, modify, or supplement the Objection, to file additional objections to the Subject Claims or any other claims (filed or not) which have or may be asserted against the Debtors, and to seek further reduction of any of the Subject Claims, are fully preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Trustee's s right to object on other stated grounds or any other grounds that the Trustee discovers during the pendency of these Cases are further preserved.

9. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Schedule 1 – No Liability Claims

Schedule 1 - No Liability Claims

Claimant	Claim No.	Debtor	Asserted Claim Amount(s) & Classification(s)	Reason for Disallowance
Apogee Pharmacy	354	Novan, Inc.	$38,971.90 General Unsecured	This claim is for pharmacy coupon reimbursement that must be processed by and through Change Healthcare Solutions, LLC ("Change"). Upon information and belief, (a) such amounts were included in the invoices that comprise Claim #272 held by Change, as assignee of Truvervis, Inc. (the "Change Claim"), and (b) any distribution on this claim should be made by Change after any distribution is made in these cases on account of the Change Claim.
Arizona Department of Revenue	1	EPI Health, LLC	(1) $3,842.40 Priority; (2) $27.49 General Unsecured	Claimant asserts an estimated claim due to non filing of withholding taxes the periods 9/30/2021, 12/31/2021, and 3/31/2021. Upon information and belief, all withholding taxes were paid and there is no remaining liability.
Arizona Department of Revenue	2	Novan, Inc.	$500.00 Priority	Claimant asserts an estimated claim for non-filing of corporate tax returns for 2022. Upon information and belief, all tax returns were filed and there was no remaining liability.
Connecticut Department of Revenue	350	Novan, Inc.	(1) $5,300.00 Priority; (2) $500.00 General Unsecured	Claimant asserts an estimated withholding tax for Q2, Q3, amd Q4 of 2022 and Q1 and Q2 of 2023 with interest. According to the Books and Records, the Debtors did not have employees in Connecticut during those periods. As such, there is no liability.
Department of Treasury - Internal Revenue Service	23	EPI Health, LLC	$2,038.17 Priority	Claimant asserts a FICA withholding tax for the period 5/30/2022. Upon information and belief, all withholding taxes were paid and there is no remaining liability.
Franchise Tax Board	328	EPI Health, LLC	Unliquidated	Claimant asserts an unliquidated amounts for failure to file tax returns for years 2022 and 2023. Upon information and belief, returns have been filed and taxes were fully paid.

Schedule 1 - No Liability Claims

Claimant	Claim No.	Debtor	Asserted Claim Amount(s) & Classification(s)	Reason for Disallowance
Hope Specialty Pharmacy	356	Novan, Inc.	$99,862.51 General Unsecured	This claim is for pharmacy coupon reimbursement that must be processed by and through Change Healthcare Solutions, LLC ("Change"). Upon information and belief, (a) such amounts were included in the invoices that comprise Claim #272 held by Change, as assignee of Truvervis, Inc. (the "Change Claim"), and (b) any distribution on this claim should be made by Change after any distribution is made in these cases on account of the Change Claim.
Medscript Pharmacy	275	Novan, Inc.	$57,992.27 General Unsecured	This claim is for pharmacy coupon reimbursement that must be processed by and through Change Healthcare Solutions, LLC ("Change"). Upon information and belief, (a) such amounts were included in the invoices that comprise Claim #272 held by Change, as assignee of Truvervis, Inc. (the "Change Claim"), and (b) any distribution on this claim should be made by Change after any distribution is made in these cases on account of the Change Claim.
New York State Department of Labor	355	Novan, Inc.	$51.84 Priority	Claimant asserts a claim for unemployment insurance contributions for the period 4/2021 - 3/2022. According to the Books and Records, the Debtors did not have employees in New York during that period. As such, there is no liability.
New York State Department of Taxation and Finance	367	Novan, Inc.	$3,093.39 Administrative Priority	Claimant asserts estimated interest and penalties for withholding tax for the periods ending in 12/31/23, 3/31/24, and 6/30/24. According to the Books and Records, all withholding taxes were paid and there is no remaining liability.
North Carolina Department of Revenue	44	Novan, Inc.	(1)$2,665.47 Priority; and (2) $2,714.23 General Unsecured	Claimant asserts sales & use and withholding taxes for various periods ranging from 7/1/2021 - 3/31/2023. Upon information and belief, all of these taxes were paid and there is no remaining liability.
Ohio Department of Taxation	31	EPI Health, LLC	(1) $1,174.39 Priority; and (2) 297.35 General Unsecured	Claimant asserts withholding taxes for the year 2022. Upon information and belief, all of these taxes were paid and there is no remaining liability.

Schedule 1 - No Liability Claims

Claimant	Claim No.	Debtor	Asserted Claim Amount(s) & Classification(s)	Reason for Disallowance
Ohio Department of Taxation	358	EPI Health, LLC	$1,122.66 Administrative Priority	Claimant asserts withholding taxes for the year 2023. Upon information and belief, all of these taxes were paid and there is no remaining liability.
Oregon DHS	361	EPI Health, LLC	$405.92 Administrative	Claimant asserts a claim for rebate of labeler code 71403 during the 4th quarter of 2023. Such labeler code was sold to Ligand Pharmaceuticals and that sale closed on September 27, 2023. As such, there is no liability.

Schedule 2 – Overstated Claims

Schedule 2 - Overstated Claims

Claimant	Claim No.	Debtor	Current General Unsecured Claim Amount	Modified General Unsecured Claim Amount	Reason for Modification
Ashfield Market Access, LLC	270	EPI Health, LLC	304,682.30	$90,112.92	According to the Books and Records, the Debtors dispute all of the pre-petition invoices except for Invoice Nos. 1000856, 1000882, and 1000874 totaling $90,112.92. Additionally, Invoice #100098 for $180,000 are for fees from September - December 2023, at which during such period, the Debtors were no longer operating as they closed the sales of their product business in September 2023.
Change Healthcare Solutions, LLC, as assignee of Truveris, Inc.	272	EPI Health, LLC	$6,298,804.59	$6,124,538.64	This claim is for pharmacy copay reimbursements, copay managegement services, and related fees including additional fees for future services rendered in the amount of $174,265.95. This fee was not included in the Books and Records and was disputed. Claimant's counsel has no objection to the modified amount.
Lytho, Inc.	352	EPI Health, LLC	$7,900.04	$4,473.62	According to the Books and Records and the Debtors Schedules [Docket No. 154], there was a prepayment of $3,426.42 made to the claimant. As such, the claim should be reduced to the modified amount.

Schedule 3 – Misclassified Claim

Schedule 3 - Misclassified Claim

			Asserted Claim		Modified Claim		
Claimant	**Claim Number**	**Debtor**	**Claim Amount(s)**	**Claim Classification(s)**	**Claim Amount (s)**	**Claim Classification (s)**	**Reason for Modification**
U.S. Dept. of Health and Human Services, Centers for Medicre and Medicaid Services, MDBG	345	EPI Health, LLC	(1) $89,962.15 + unliquidated amounts (2) $29,231.06 + unliquidated amounts	(1) Secured (2) Administrative	$89,962.15	General Unsecured	Claim asserts secured and administrative claims for reimbursement of prescription discounts invoiced in Q2 and Q3 of 2023 as well as unliquidated amounts. Claimant does not provide documentation establishing a post-petition transaction and a benefit to the estate. It also fails to established a secured basis for the claim. As such, there is no basis for an administrative or secured claim.

EXHIBIT B

Halperin Declaration

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:	Chapter 11
NVN Liquidation, Inc. f/k/a NOVAN, Inc., *et al*.,[1]	Case No. 23-10937 (LSS)
Debtors.	(Jointly Administered)

DECLARATION OF ALAN D. HALPERIN PURSUANT TO 28 U.S.C. § 1746 AND LOCAL RULE 3007-1 IN SUPPORT OF TRUSTEE'S SEVENTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)
(No Liability, Overstated, and Misclassified Claims)

Alan D. Halperin, under penalty of perjury, hereby declares as follows:

1. I am the liquidating trustee (the "Trustee") of the NVN Liquidation, Inc. Liquidating Trust (the "Trust") as successor in interest to the remaining asset of NVN Liquidation, Inc. f/k/a Novan, Inc. and EPI Health, LLC (collectively, the "Debtors"). I submit this declaration in support of the *Trustee's Seventh Omnibus Objection to Claims (Substantive)* (the "Objection"), pursuant to which I am requesting that this Court enter an order: (a) disallowing and expunging the No Liability Claims, (b) reducing the Overstated Claims, and (c) reclassifying and modifying the Misclassified Claim. Unless otherwise stated in this declaration, I have personal knowledge of the facts set forth herein.

2. Except as otherwise indicated, all facts set forth in this declaration are based upon my personal knowledge, my review (or the review of counsel, consultants and other professionals under my supervision) of business records kept by the Debtors in the ordinary course of business, the relevant proofs of claim, and/or the Claims Register maintained by the Claims Agent in the Cases. The grounds for the Objection are based on the review conducted.

[1] The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification number, are: NVN Liquidation, Inc. (f/k/a Novan, Inc.) (7682) and EPI Health, LLC (9118).

3. I have personally reviewed the Objection and to the best of my knowledge, information and belief, the information contained on **Schedules 1, 2, and 3** (the "Schedules") to the Proposed Order attached as **Exhibit A** to the Objection is true and correct.

4. My counsel, consultants and other professionals and/or I reviewed all of the No Liability Claims identified in Schedule 1, together with any supporting documentation filed therewith, made reasonable efforts to research and reconcile the No Liability Claims in and with the Books and Records, and determined that such documentation does not provide *prima facie* evidence of the validity and amount of these claims and/or upon information and belief, have been fully satisfied during the course of the this case. The more particular basis for each individual disallowance is set forth in Schedule 1 under the column "Reason for Disallowance." Therefore, the No Liability Claims should be disallowed and expunged in their entirety.

5. My counsel, consultant and other professionals and/or I reviewed the Overstated Claims identified in Schedule 2, together with any supporting documentation filed therewith, made reasonable efforts to research and reconcile the claims with the Books and Records, and have determine that the claims were filed for amounts inconsistent with the Books and Records as detailed on Schedule 2. Therefore, the Overstated Claims should be reduced in accordance with Books and Records.

6. My counsel, consultant and other professionals and/or I reviewed the Misclassified Claim identified in Schedule 3, together with any supporting documentation filed therewith, made reasonable efforts to research and reconcile the claim with the Books and Records and have determined that the claim was improperly filed as a secured and administrative claim because it failed to established a basis and was filed for an amount inconsistent with Books and Records. Therefore, the Misclassified and Overstated Claim should be reclassified as general unsecured claim and modified as set forth on Schedule 3.

7. Based on the foregoing, and to the best of my knowledge, information and belief, the information contained in the Objection and the Schedules thereto is true and correct.

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.

Executed on: April 27, 2026

/s/ Alan D. Halperin
Alan D. Halperin