

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

TRICIDA, INC.,¹

Debtor.

Chapter 11

Case No. 23-10024 (JTD)

Ref. Docket No. 462

CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 462

The undersigned hereby certifies that, as of the date hereof, she has received no answer, objection, or other responsive pleading to the *Debtor's Motion for an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing the Debtor to Retain Expert Witness* [Docket No. 462] (the "Motion") filed with the United States Bankruptcy Court for the District of Delaware (the "Court") on May 15, 2023.

The undersigned further certifies that, as of the date hereof, she has reviewed the Court's docket in this case and no answer, objection, or other responsive pleading to the Motion appears thereon. Objections to the Motion were to be filed and served by 4:00 p.m. (ET) on May 30, 2023. As no responses to the Motion have been received, it is hereby respectfully requested that the proposed order attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

[Signature page follows]

¹ The Debtor in this chapter 11 case, together with the last four digits of the Debtor's federal tax identification number, is Tricida, Inc. (2526). The Debtor's service address is 2108 N Street, Suite 4935, Sacramento, CA 95816.



Dated: June 1, 2023
Wilmington, Delaware

/s/ Allison S. Mielke

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

Sean M. Beach (No. 4070)
Allison S. Mielke (No. 5934)
Andrew A. Mark (No. 6861)
Carol Cox (No. 6936)

Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Emails: sbeach@ycst.com
amielke@ycst.com
amark@ycst.com
ccox@ycst.com

SIDLEY AUSTIN LLP

Samuel A. Newman (admitted *pro hac vice*)
555 West Fifth Street
Los Angeles, California 90013
Telephone: (213) 896-6000
Facsimile: (213) 896-6600
Email: sam.newman@sidley.com

Charles M. Persons (admitted *pro hac vice*)
Jeri Leigh Miller (admitted *pro hac vice*)
Chelsea McManus (admitted *pro hac vice*)
2021 McKinney Avenue, Suite 2000
Dallas, Texas 75201
Telephone: (214) 981-3300
Facsimile: (213) 981-3400
Email: cpersons@sidley.com
jeri.miller@sidley.com
cmcmanus@sidley.com

Michael Sabino (admitted *pro hac vice*)
787 7th Avenue
New York, New York 10019
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: msabino@sidley.com

Counsel to the Debtor

EXHIBIT A

Proposed Order

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

In re:

TRICIDA, INC.,¹

Debtor.

Chapter 11

Case No. 23-10024 (JTD)

Re: Docket No. 462

**ORDER PURSUANT TO 11 U.S.C. §§ 105 AND 363 AUTHORIZING THE
DEBTOR TO RETAIN EXPERT WITNESS**

Upon consideration of the motion (the “Motion”)² of the Debtor for entry of an order authorizing the Debtor to pay fees and expenses of A&M Taxand in connection with the Debtor’s ongoing Plan confirmation process; and this Court having jurisdiction to consider the Motion and the relief requested therein 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; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and adequate notice of the Motion and opportunity for objection having been given under the circumstances; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein and that such relief is in the best interests of the Debtor, its estates, its creditors, and all parties in interest; and any objections to the Motion having been withdrawn or overruled on the merits; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

¹ The Debtor in this chapter 11 case, together with the last four digits of the Debtor’s federal tax identification number, is Tricida, Inc. (2526). The Debtor’s service address is 2108 N St., Ste. 4935, Sacramento, CA 95816.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

1. The Motion is granted as set forth herein.
2. The Debtor is hereby authorized to execute and enter into the Contract, which is hereby approved, and the Debtor is hereby authorized and empowered to pay all fees and expenses set forth in the Contract.
3. Nothing in this order constitutes (a) an admission as to the validity of any claim against the Debtor; (b) a waiver of the Debtor's or any party in interest's rights to dispute the amount of, basis for, or validity of any claim or interest under applicable law or nonbankruptcy law; (c) a promise or requirement to pay any claim; (d) a waiver of the Debtor's or any other party in interest's rights under the Bankruptcy Code or any other applicable law; or (e) a request for or granting of approval for assumption of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code. Any payment made pursuant to this order is not intended to be nor should it be construed as an admission as to the validity of any claim or a waiver of the Debtor's rights to subsequently dispute such claim.
4. Notice of the Motion shall be deemed good and sufficient notice of such Motion, and the requirements of any applicable Bankruptcy Rules and the Local Rules are satisfied by such notice.
5. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.
6. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.