

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

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In re: : Chapter 11

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NOVUM PHARMA, LLC, : Case No. 19-10209 (BLS)

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Debtor.¹ :

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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JULY 24, 2019 AT 11:00 A.M. (EASTERN TIME)
BEFORE THE HONORABLE BRENDAN L. SHANNON²**

ORDERS ENTERED

1. Debtor’s Motion for Order Under Section 365(d)(4) of the Bankruptcy Code and Bankruptcy Rule 9006 Extending Time Within Which the Debtor May Assume or Reject Unexpired Leases of Nonresidential Real Property (Filed May 31, 2019) [Docket No. 299]

Related Documents:

- (a) Notice of Rescheduled Hearing (Filed June 17, 2019) [Docket No. 313]
- (b) Certification of No Objection Regarding Debtor’s Motion for Order Under Section 365(d)(4) of the Bankruptcy Code and Bankruptcy Rule 9006 Extending Time Within Which the Debtor May Assume or Reject Unexpired Leases of Nonresidential Real Property (Filed June 19, 2019) [Docket No. 319]
- (c) Order Under Section 365(d)(4) of the Bankruptcy Code and Bankruptcy Rule 9006 Extending Time Within Which the Debtor May Assume or Reject Unexpired Leases of Nonresidential Real Property (Entered July 5, 2019) [Docket No. 356]

Objection Deadline: June 18, 2019 at 4:00 p.m.

Responses Received: None.

¹ The last four digits of the Debtor’s federal tax identification number are 7895. The mailing address for the Debtor is 200 South Wacker Drive, 31st Floor, Chicago, IL 60606.

² The hearing will be held before The Honorable Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801. Any person who wishes to appear telephonically at the hearing must contact COURTCALL, LLC at 866-582-6878 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised May



Status: The Court entered an Order granting the Motion. This matter will not be going forward.

2. Debtor's Motion for Order Under Section 1121(d) of the Bankruptcy Code Extending Exclusive Periods During Which Debtor May File and Solicit Acceptances of a Chapter 11 Plan (Filed May 31, 2019) [Docket No. 300]

Related Documents:

- (a) Notice of Rescheduled Hearing (Filed June 17, 2019) [Docket No. 313]
- (b) Certification of No Objection Regarding Debtor's Motion for Order Under Section 1121(d) of the Bankruptcy Code Extending Exclusive Periods During Which Debtor May File and Solicit Acceptances of a Chapter 11 Plan (Filed June 19, 2019) [Docket No. 320]
- (c) Order Pursuant to Section 1121(d) of the Bankruptcy Code Extending Exclusive Periods During Which Debtor May File and Solicit Acceptances of a Chapter 11 Plan (Entered July 5, 2019) [Docket No. 357]

Objection Deadline: June 18, 2019 at 4:00 p.m.

Responses Received: None.

Status: The Court entered an Order granting the Motion. This matter will not be going forward.

3. Debtor's Motion for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 Authorizing Amendments to Contract Sales Agreement with Assertio Therapeutics, Inc. (Filed July 2, 2019) [Docket No. 353]

Related Documents:

- (a) Certification of No Objection Regarding Debtor's Motion for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 Authorizing Amendments to Contract Sales Agreement with Assertio Therapeutics, Inc. (Filed July 17, 2019) [Docket No. 377]
- (b) Order Pursuant to 11 U.S.C. §§ 105(a) and 363 Authorizing Amendments to Contract Sales Agreement with Assertio Therapeutics, Inc. (Entered July 18, 2019) [Docket No. 378]

Objection Deadline: July 16, 2019 at 4:00 p.m.

Responses Received: None.

Status: The Court entered an Order granting the Motion. This matter will not be going forward.

MATTERS GOING FORWARD

4. Debtor's Motion For Order (A) Approving Disclosure Statement; (B) Scheduling Hearing on Confirmation of Plan; (C) Establishing Deadlines and Procedures For (I) Filing Objections to Confirmation of Plan, (II) Claim Objections and (III) Temporary Allowance of Claims For Voting Purposes; (D) Determining Treatment of Certain Unliquidated, Contingent or Disputed Claims For Notice, Voting and Distribution Purposes; (E) Setting Record Date; (F) Approving (I) Solicitation Packages and Procedures For Distribution, (II) Form of Notice of Hearing on Confirmation and Related Matters and (III) Forms of Ballots; (G) Establishing Voting Deadline and Procedures For Tabulation of Votes; and (H) Granting Related Relief (Filed June 21, 2019) [Docket No. 326]

Related Documents:

- (a) Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtor (Filed June 21, 2019) [Docket No. 324]
- (b) Disclosure Statement With Respect to Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtor (Filed June 21, 2019) [Docket No. 325]
- (c) Debtor's Motion to Set Expedited Hearing and Shorten Objection Deadline With Respect to Debtor's Motion For Order (A) Approving Disclosure Statement; (B) Scheduling Hearing on Confirmation of Plan; (C) Establishing Deadlines and Procedures For (I) Filing Objections to Confirmation of Plan, (II) Claim Objections and (III) Temporary Allowance of Claims For Voting Purposes; (D) Determining Treatment of Certain Unliquidated, Contingent or Disputed Claims For Notice, Voting and Distribution Purposes; (E) Setting Record Date; (F) Approving (I) Solicitation Packages and Procedures For Distribution, (II) Form of Notice of Hearing on Confirmation and Related Matters and (III) Forms of Ballots; (G) Establishing Voting Deadline and Procedures For Tabulation of Votes; and (H) Granting Related Relief (Filed June 21, 2019) [Docket No. 327]
- (d) Order Setting Expedited Hearing and Shortening Objection Deadline With Respect to Debtor's Motion For Order (A) Approving Disclosure Statement; (B) Scheduling Hearing on Confirmation of Plan; (C) Establishing Deadlines and Procedures For (I) Filing Objections to Confirmation of Plan, (II) Claim Objections and (III) Temporary Allowance of Claims For Voting Purposes; (D) Determining Treatment of Certain Unliquidated, Contingent or Disputed Claims For Notice, Voting and Distribution Purposes; (E) Setting Record Date; (F) Approving (I) Solicitation Packages and Procedures For Distribution, (II) Form of Notice of Hearing on Confirmation and Related Matters and (III) Forms of Ballots; (G) Establishing Voting Deadline and Procedures For Tabulation

of Votes; and (H) Granting Related Relief (Entered June 21, 2019) [Docket No. 329]

- (e) Notice of Hearing on Disclosure Statement and Solicitation Procedures Motion and Related Objection Deadline (Filed June 21, 2019) [Docket No. 330]
- (f) Order Authorizing Debtor to Enter Into Plan Support Agreement (Entered July 11, 2019) [Docket No. 368]
- (g) Notice of Filing of Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtor (Filed July 22, 2019) [Docket No. 382]
- (h) Notice of Filing of Disclosure Statement With Respect to Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtor (Filed July 22, 2019) [Docket No. 383]
- (i) Notice of Filing of Revised Order (A) Approving Disclosure Statement; (B) Scheduling Hearing on Confirmation of Plan; (C) Establishing Deadlines and Procedures For (I) Filing Objections to Confirmation of Plan, (II) Claim Objections and (III) Temporary Allowance of Claims For Voting Purposes; (D) Determining Treatment of Certain Unliquidated, Contingent or Disputed Claims For Notice, Voting and Distribution Purposes; (E) Setting Record Date; (F) Approving (I) Solicitation Packages and Procedures For Distribution, (II) Form of Notice of Hearing on Confirmation and Related Matters and (III) Forms of Ballots; (G) Establishing Voting Deadline and Procedures For Tabulation of Votes; and (H) Granting Related Relief (Filed July 22, 2019) [Docket No. 385]

Objection Deadline: July 17, 2019 at 4:00 p.m. On consent of the parties, the Objection Deadline was extended until 4:00 p.m. on July 19, 2019 for PSKW, LLC d/b/a ConnectiveRx.

Responses Received:

- (a) The Debtor received informal comments from the Office of the United States Trustee.

Status: This matter will be going forward. The comments raised by the Office of the United States Trustee have been addressed through revisions to the proposed form of order (as reflected in the blackline order filed at Docket No. 385) and the Disclosure Statement (as reflected in the blackline filed at Docket No. 383), so this matter is going forward without objection.

5. Debtor's Motion for Entry of Final Order (I) Authorizing Debtor to Obtain Postpetition Secured Financing; (II) Granting Liens and Superpriority Claims; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief (Filed July 3, 2019) [Docket No. 355]

Related Documents:

- (a) Notice of Filing of Revised Final Order (I) Authorizing Debtor to Obtain Postpetition Secured Financing; (II) Granting Liens and Superpriority Claims; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief (Filed July 22, 2019) [Docket No. 387]
- (b) Declaration of Thomas S. O'Donoghue, Jr. in Support of Debtor's Motion for Entry of Final Order (I) Authorizing Debtor to Obtain Postpetition Secured Financing; (II) Granting Liens and Superpriority Claims; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief (Filed July 22, 2019) [Docket No. 388]

Objection Deadline: July 17, 2019 at 4:00 p.m. On consent of the parties, the Objection Deadline was extended until 10:00 a.m. on July 22, 2019 for PSKW, LLC d/b/a ConnectiveRx.

Responses Received:

- (a) The Debtor received informal comments from the Office of the United States Trustee.
- (b) Objection of PSKW, LLC d/b/a ConnectiveRx With Respect to Debtor's Motion for Entry of Final Order (I) Authorizing Debtor to Obtain Postpetition Secured Financing; (II) Granting Liens and Superpriority Claims; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief (Filed July 22, 2019) [Docket No. 384]

Status: This matter will be going forward. The comments raised by the Office of the United States Trustee have been addressed through revisions to the proposed form of order (as reflected in the blackline order filed at Docket No. 387), so the objection filed by PSKW, LLC d/b/a ConnectiveRx is the only objection remaining to the Debtor's financing motion.

FEE APPLICATIONS – GOING FORWARD

6. Notice of Hearing on Interim Fee Applications (Filed June 17, 2019) [Docket No. 314]

Related Documents:

- (a) Index of Monthly and Interim Fee Applications and Certifications with Respect to the Interim Period, February 3, 2019 Through and Including April 30, 2019 (Attached hereto as Exhibit A)³
- (b) Certification of Counsel Regarding Omnibus Order Approving Fee Applications for the Interim Compensation Period February 3, 2019 Through and Including April 30, 2019 (Filed July 22, 2019) [Docket No. 386]

Objection Deadline: See Respective Fee Applications.

Responses Received: None.

Status: A Certification of Counsel, together with a proposed order, was filed with the Court. With the Court's permission, this matter will not be going forward.

Dated: Wilmington, Delaware
July 22, 2019

COLE SCHOTZ P.C.

/s/ David R. Hurst
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– and –

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*Counsel for Debtor and
Debtor-in-Possession*

³ A binder of the respective fee applications scheduled for hearing was submitted to Chambers on July 17, 2019.

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

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In re: : Chapter 11

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NOVUM PHARMA, LLC, : Case No. 19-10209 (BLS)

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Debtor.¹ :

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**EXHIBIT A TO NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON FOR HEARING ON JULY 24, 2019 AT 11:00 A.M.
BEFORE THE HONORABLE BRENDAN L. SHANNON**

1. Notice of Hearing on Interim Fee Applications (Filed June 17, 2019) [Docket No. 314]

Fee Applications:

A. Cole Schotz P.C. (Counsel to the Debtor)

1. First Interim Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 through April 30, 2019 (Filed May 31, 2019) [Docket No. 296]
2. Certification of No Objection Regarding First Interim Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 through April 30, 2019 (Filed June 25, 2019) [Docket No. 335]
3. First Monthly Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 Through February 28, 2019 (Filed April 1, 2019) [Docket No. 184]
4. Certification of No Objection Regarding First Monthly Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 through February 28, 2019 (Filed April 23, 2019) [Docket No. 241]

¹ The last four digits of the Debtor’s federal tax identification number are 7895. The mailing address for the Debtor is 200 South Wacker Drive, 31st Floor, Chicago, IL 60606.

5. Second Monthly Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2019 through March 31, 2019 (Filed April 17, 2019) [Docket No. 219]
6. Certification of No Objection Regarding Second Monthly Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2019 through March 31, 2019 (Filed May 9, 2019) [Docket No. 259]
7. Third Monthly Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from April 1, 2019 through April 30, 2019 (Filed May 23, 2019) [Docket No. 269]
8. Certification of No Objection Regarding Third Monthly Fee Application of Cole Schotz P.C., Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from April 1, 2019 through April 30, 2019 (Filed June 17, 2019) [Docket No. 312]

B. Teneo Capital LLC (Investment Banker to the Debtor)

1. First Interim Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 through April 30, 2019 (Filed May 31, 2019) [Docket No. 298]
2. Certification of No Objection Regarding First Interim Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 through April 30, 2019 (Filed June 25, 2019) [Docket No. 337]
3. First Monthly Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 through February 28, 2019 (Filed April 2, 2019) [Docket No. 188]
4. Certification of No Objection Regarding First Monthly Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from February 3, 2019 through February 28, 2019 (Filed April 24, 2019) [Docket No. 243]

5. Second Monthly Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2019 through March 31, 2019 (Filed April 18, 2019) [Docket No. 222]
6. Certification of No Objection Regarding Second Monthly Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2019 through March 31, 2019 (Filed May 13, 2019) [Docket No. 260]
7. Third Monthly Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from April 1, 2019 through April 30, 2019 (Filed May 22, 2019) [Docket No. 266]
8. Certification of No Objection Regarding Third Monthly Fee Application of Teneo Capital LLC, Investment Banker to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from April 1, 2019 through April 30, 2019 (Filed June 13, 2019) [Docket No. 309]

C. Kurtzman Carson Consultants LLC (Administrative Agent to the Debtor)

1. First Interim Fee Application of Kurtzman Carson Consultants LLC, as Administrative Agent to the Debtor and Debtor in Possession, for the Period from February 3, 2019 through April 30, 2019 (Filed May 31, 2019) [Docket No. 297]
2. Certification of No Objection Regarding First Interim Fee Application of Kurtzman Carson Consultants LLC, as Administrative Agent to the Debtor and Debtor in Possession, for the Period from February 3, 2019 through April 30, 2019 (Filed June 25, 2019) [Docket No. 336]
3. First Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Agent to the Debtor, for the Period from February 3, 2019 through February 28, 2019 (Filed April 3, 2019) [Docket No. 191]
4. Certification of No Objection Regarding First Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Agent to the Debtor, for the Period from February 3, 2019 through February 28, 2019 (Filed April 25, 2019) [Docket No. 244]
5. Second Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Agent to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2019 through March 31, 2019 (Filed May 2, 2019) [Docket No. 252]

6. Certification of No Objection Regarding Second Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Agent to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2019 through March 31, 2019 (Filed May 24, 2019) [Docket No. 272]

D. Klehr Harrison Harvey Branzburg LLP (Co-Counsel to Official Committee of Unsecured Creditors)

1. First Interim Fee Application of Klehr Harrison Harvey Branzburg LLP for Payment of Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the Period From February 12, 2019 through April 30, 2019 (Filed May 30, 2019) [Docket No. 293]
2. Certificate of No Objection Regarding Docket No. 293 (Filed July 1, 2019) [Docket No. 348]
3. First Monthly Fee Application of Klehr Harrison Harvey Branzburg LLP as Co-Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from February 12, 2019 through March 31, 2019 (Filed May 17, 2019) [Docket No. 264]
4. Certificate of No Objection Regarding Docket No. 264 (Filed June 10, 2019) [Docket No. 306]
5. Second Monthly Fee Application of Klehr Harrison Harvey Branzburg LLP as Co-Counsel to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from April 1, 2019 through April 30, 2019 (Filed May 30, 2019) [Docket No. 292]
6. Certificate of No Objection Regarding Docket No. 292 (Filed June 24, 2019) [Docket No. 334]

E. Sills Cummis & Gross P.C. (Co-Counsel to Official Committee of Unsecured Creditors)

1. First Interim Application of Sills Cummis & Gross P.C. for Compensation for Services Rendered and Reimbursement of Expenses, as Co-Counsel to the Official Committee of Unsecured Creditors, for the Period from February 12, 2019 through April 30, 2019 (Filed May 30, 2019) [Docket No. 289]
2. Certificate of No Objection Regarding Docket No. 289 (Filed July 1, 2019) [Docket No. 347]

3. First Consolidated Monthly Application of Sills Cummis & Gross P.C. for Compensation for Services Rendered and Reimbursement of Expenses, as Co-Counsel to the Official Committee of Unsecured Creditors, for the Period from February 12, 2019 through April 30, 2019 (Filed May 30, 2019) [Docket No. 286]
4. Certificate of No Objection Regarding Docket No. 286 (Filed June 24, 2019) [Docket No. 333]

F. Goldin Associates, LLC (Financial Advisor to Official Committee of Unsecured Creditors)

1. First Interim Fee Application of Goldin Associates, LLC for Payment of Compensation and Reimbursement of Expenses as Financial Advisor to the Official Committee of Unsecured Creditors for the Period from February 22, 2019 through April 30, 2019 (Filed May 31, 2019) [Docket No. 301]
2. Certificate of No Objection Regarding Docket No. 301 (Filed July 1, 2019) [Docket No. 349]
3. First Monthly Application of Goldin Associates, LLC as Financial Advisor to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from February 22, 2019 through February 28, 2019 (Filed May 21, 2019) [Docket No. 265]
4. Certificate of No Objection Regarding Docket No. 265 (Filed June 12, 2019) [Docket No. 308]
5. Second Monthly Application of Goldin Associates, LLC as Financial Advisor to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from March 1, 2019 through March 31, 2019 (Filed May 22, 2019) [Docket No. 267]
6. Certificate of No Objection Regarding Docket No. 267 (Filed June 24, 2019) [Docket No. 331]
7. Third Monthly Application of Goldin Associates, LLC as Financial Advisor to the Official Committee of Unsecured Creditors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from April 1, 2019 through April 30, 2019 (Filed May 30, 2019) [Docket No. 285]
8. Certificate of No Objection Regarding Docket No. 285 (Filed June 24, 2019) [Docket No. 332]