

SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION. CLAIMANTS RECEIVING THIS OBJECTION SHOULD REVIEW IT TO SEE IF THEIR NAMES APPEAR ON THE EXHIBIT ATTACHED HERETO TO DETERMINE WHETHER THE OBJECTION AFFECTS THEIR CLAIMS. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE TRUSTEE’S COUNSEL, MATTHEW MURRAY AT 212-765-9100 EXT. 108 OR BY EMAIL MMURRAY@HALPERINLAW.NET

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

In re:

INSYS THERAPEUTICS, INC., *et al.*,

Liquidating Debtors.¹

Chapter 11

Case No. 19-11292 (JTD)

(Jointly Administered)

Hearing Date: May 19, 2021 at 11:00 a.m. (ET)

Objection Deadline: May 12, 2021 at 4:00 p.m. (ET)

**ELEVENTH OMNIBUS OBJECTION OF THE TRUSTEE OF
THE INSYS LIQUIDATION TRUST TO CLAIMS (SUBSTANTIVE)**
(Equity Interests Claims)

William Henrich, in his capacity as liquidating trustee (the “Trustee”) of the Insys Liquidation Trust (the “Liquidation Trust”), as successor in interest to the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby files this eleventh omnibus objection (the “Objection”), pursuant to §§ 105(a) and 502 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) 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

¹ The Liquidating Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

“Proposed Order”), a) reclassifying certain claims identified on **Exhibit 1** attached to the Proposed Order as Class 13 Equity Interests (individually, an “Equity Claim”, and collectively, the “Equity Claims”) and b) disallowing such claims in their entirety. In support of this Objection, the Trustee submits the *Declaration of Edward A. Phillips Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Support of the Eleventh Omnibus Objection of the Liquidating Trustee of the Insys Liquidation Trust to Claims (Substantive)* (the “Declaration”) attached hereto as **Exhibit B**. In further support of this Objection, the Trustee respectfully represents as follows:

BACKGROUND

1. On June 10, 2019 (the “Petition Date”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”).
2. On June 11, 2019, this Court entered an order authorizing and approving the retention of Epiq Corporate Restructuring, LLC as claims and noticing agent in these Chapter 11 Cases (the “Agent”) [Docket No. 48].
3. On June 20, 2019, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors in these Chapter 11 Cases (the “Committee”). No trustee or examiner has been appointed in these Chapter 11 Cases.
4. On July 30, 2019, each of the Debtors filed with this Court its *Schedule of Assets and Liabilities* [Docket Nos. 363, 365, 367, 369, 371, 373, and 375] (the “Schedules”).
5. On January 16, 2020, this Court entered an order [Docket No. 1115] (the “Confirmation Order”) confirming the *Second Amended Joint Chapter 11 Plan of Liquidation of Insys Therapeutics, Inc. and Its Affiliated Debtors* (the “Plan”) in the Chapter 11 Cases. As provided for in the Confirmation Order, all assets and liabilities of the Debtors were

substantively consolidated and substantive consolidation would be implemented for distribution purposes in accordance with the Plan (the “Substantive Consolidation”).

6. On February 18, 2020 (the “Effective Date”), the Plan became effective in accordance with its terms and, in accordance with the Plan, Confirmation Order and that certain *Trust Agreement for Insys Liquidation Trust* (the “Trust Agreement”), certain assets² of the Debtors existing as of such date were transferred to and became vested in the Liquidation Trust, and William Henrich was appointed the Trustee of the Liquidation Trust.

7. In accordance with the Plan and the Trust Agreement, from and after the Effective Date, objections to various claims³ may be prosecuted by the Trustee. *See e.g.*, Section 7.1 of the Plan.

8. Under the Plan on the Effective Date, Equity Interests were deemed cancelled without further action by or order of the Court. The Plan and the Confirmation Order also provides that holders of Equity Interests shall not receive or retain any property on account of such interests. *See e.g.*, Section 4.13 of the Plan and Paragraph H of the Confirmation Order.

9. Pursuant an order dated July 15, 2019 (the “Bar Date Order”), [Docket No. 294], this Court established the following deadlines: (a) September 16, 2019 as the last day for non-governmental entities to file pre-petition claims against the Debtors and their estates (the “General Bar Date”); (b) December 9, 2019 as the last day for governmental entities and Native American tribes to file pre-petition claims against the Debtors and their estates (the “Government Bar Date”)⁴; and (c) October 24, 2019 as the last day to file administrative claims arising

² These assets include all assets of the Debtors other than (i) the VRT Operating Reserve, (ii) the Products Liability Insurance Rights, and (iii) any Interests held by Liquidating Debtors in other Liquidating Debtors, as defined in the Plan.

³ Other than Personal Injury Claims (as defined in the Plan).

⁴ The Government Bar Date was later extended to January 31, 2019 to any State pursuant to the *Order Approving Stipulation By and Between the Debtors, the Official Committee of Unsecured Creditors, and Certain States Regarding Extending the Bar Date* [Docket No. 948].

between the Petition Date and September 9, 2019, excluding professional claims and claims asserting administrative priority and arising out of the ordinary course of business after the Petition Date (together with the General Bar Date and the Government Bar Date, the “Bar Dates”).

10. In accordance with the Bar Date Order, the Agent served a Notice of Bar Dates and the related documents and forms as evidence by the affidavits of service filed with this Court (the “Bar Date AOS”) [Docket Nos. 315, 406, 504, 587, 713, 821, and 887]. Additionally, in accordance with the Bar Date Order, the Debtors published notice of the Bar Dates once in the national editions of the New York Times and USA Today, and once in the following publications: Memphis Commercial Appeal, Indianapolis Star, Florida Times Union (Jacksonville), Las Vegas Review Journal Sun, Saginaw News, Arizona Republic, Dallas Morning News, Miami Herald, Los Angeles Times, and San Antonio Express News (the “Publication Notices”).

11. Pursuant to the Confirmation Order and the Plan, the deadline to object to claims (other than Administrative Claims) is one-hundred eighty (180) days following the later of the (a) Effective Date and (b) the date that a proof of claim is filed or amended or on such later date as fixed by this Court (the “Claims Objection Deadline”). *See* Section 7.1 of the Plan. Upon the most recent motion, an order extending the Claims Objection Deadline was extended to August 31, 2021 [Docket No. 1468]. Additionally, under the Plan, objections to Administrative Claims are to be filed no later than one hundred-twenty (120) days after the Effective Date, or such other date may be fixed by the Bankruptcy Court (the “Administrative Claims Objection Deadline”). *See* Section 2.2 of the Plan. Upon the most recent motion, an order extending the Administrative Claims Objection Deadline was extended to June 17, 2021 [Docket No. 1446].

JURISDICTION AND VENUE

12. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

CLAIM OBJECTION RELIEF REQUESTED

13. By this Objection, and for the reasons set forth more fully below, the Trustee objects to the Claims pursuant to §§ 105(a) and 502 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9014, and Local Rule 3007-1.

14. As set forth in the Declaration, the Trustee’s professionals have examined each of the Equity Claims, all supporting documentation provided by the claimant, if any, and the Debtors’ respective books and records and have determined in each case the Equity Claims were filed on account of the claimants asserting an equity interest in the Debtors and should be disallowed on the basis that such claims are not claims at all, but is an assertion of a former equity interest in one or more of the Debtors. Additionally, Equity Interests were cancelled and holders of the same were not entitled to receive any distributions under the Plan. Accordingly, each such corresponding proof of claim should be disallowed, as listed on **Exhibit 1** to the Proposed Order.

15. Pursuant to § 502 of the Bankruptcy Code, “[a] claim or interest, proof of which is filed under 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest...objects.” U.S.C. § 502(a). 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.*

16. The claims listed in **Exhibit 1** to the Proposed Order are exclusively comprised of Equity Claims filed by holders of Equity Interests. Each of the claimants set forth on **Exhibit 1** to the Proposed Order have filed proofs of claims that do not assert any claim at all, but rather assert ownership of Equity Interests.⁵ The Trustee and his professionals were able to identify the claimants that have asserted these Equity Claims because those claimants noted on the proof of claim form that the claim was filed on account of a stock interest, or, in certain instances, the claimants simply submitted a brokerage statement demonstrating ownership. Because Equity Interests asserted by holders of Equity Claims have been cancelled upon the Effective Date, the Trustee believes that all such claims should be reclassified as Class 13 Equity Interests and disallowed in their entirety. Failure to disallow such claims would entitle such interest holders to recoveries on account of "claims" to which such holders are not entitled under the Plan. Accordingly, the Trustee seeks (a) to reclassify the Equity Claims listed on **Exhibit 1** to the

⁵ Many of the claims on Exhibit 1 to the Proposed Order were also filed with little to no supporting documentation and/or filed after the applicable bar date. The Trustee anticipates filing subsequent non-substantive omnibus objections, but will not include this subset of claims at this time in order to avoid administrative confusion. The Trustee expressly reserves the right to object to those claims on Exhibit 1 to the Proposed Order on other bases in accordance with Local Rule 3007-1, if necessary.

Proposed Order, and (b) entry of the Proposed Order disallowing the Equity Claims in their entirety.

RESPONSES TO OBJECTION

17. Filing and Service of Responses. To contest this Objection, a holder of a Claim must file and serve a written response to this Objection (a “Response”) so that it is received no later than 4:00 p.m. (Eastern Time) on May 12, 2021 (the “Response Deadline”). Claimants should read the Proposed Order and Exhibits attached carefully.

18. 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 the following, so that the Response is received no later than the Response Deadline at the following addresses:

HALPERIN BATTAGLIA BENZIJA, LLP
Ligee Gu
40 Wall Street, 37th Floor
New York, NY 10005
lgu@halperinlaw.net

-and-

MORRIS, NICOLS, ARSHT & TUNNELL LLP
Matt Talmo
1201 North Market Street
PO Box 1347
Wilmington, DE 19899
mtalmo@morrisnichols.com

19. 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 Debtor, 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 amount of the disputed claim;
- (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 Bankruptcy Court or the 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.

20. Timely Response Required. If a claimant fails to file and serve a timely Response, then without further notice to the claimant or a hearing, the Trustee will present to the Court an order, substantially in the form of the order attached hereto.

NOTICE

21. 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 Equity Claim; and (iii) other parties entitled to notice under the Plan and Bankruptcy Rule 2002. The Trustee respectfully submits that no further notice of this Objection is required.

22. 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

23. 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

24. 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

Liquidation 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

25. The Trustee hereby reserves the right to object in the future to any of the Equity 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 19, 2021

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Matthew O. Talmo

Derek C. Abbott (No. 3376)
Matthew O. Talmo (No. 6333)
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-and-

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*Counsel to the Trustee of the Insys
Liquidation Trust*

Exhibit A

Proposed Order

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

In re:

INSYS THERAPEUTICS, INC., *et al.*,

Liquidating Debtors.¹

Chapter 11

Case No. 19-11292 (JTD)

(Jointly Administered)

Re: _____

**ORDER GRANTING ELEVENTH OMNIBUS OBJECTION OF THE TRUSTEE OF
THE INSYS LIQUIDATION TRUST TO CLAIMS (SUBSTANTIVE)**
(Equity Interests Claims)

Upon the *Eleventh Omnibus Objection of the Trustee of the Insys Liquidation Trust to Claims* (the “Objection”) for entry of an order disallowing and expunging in their entirety the claims set forth on Exhibit 1 hereto (each a “Claim” and collectively, the “Claims”), all as more fully set forth in the Objection; and upon the *Declaration of Edward A. Phillips Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Eleventh Omnibus Objection of the Trustee of the Insys Liquidation Trust to Claims* 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

¹ The Liquidating Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

Court having 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. Each holder of a Claim listed on **Exhibit 1** attached hereto was properly and timely served with a copy of the Objection and all of its accompanying exhibits and notice of a hearing on the Objection and response deadline,

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

C. The relief requested in the Objection is in the best interests of the Liquidation Trust, its beneficiaries, the Debtors, their estates, their creditors, 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 Claims listed on **Exhibit 1** attached hereto are hereby reclassified as Class 13 Equity Interests and disallowed in their entirety.
3. Epiq Corporate Restructuring, LLC is authorized and directed to expunge the Claims on the official claims registry pursuant to this Order and to make other changes to the official claims registry as necessary to reflect the terms of this Order.
4. Each Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each Claim. Any stay of this Order pending appeal by any of the claimants whose Claims are subject to this Order 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.

5. Nothing contained in the Objection or this Order is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors or its estates, (ii) waiver of rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of rights under Bankruptcy Code or any applicable non-bankruptcy law, (iv) an agreement or obligation to pay any claims, or (v) a waiver of any claims or causes of action which may exists against any creditor or interest holder.

6. The Trustee's rights to amend, modify, or supplement the Objection, to file additional objections to the Claims, any other claims (filed or not) which have or may be asserted against the Debtors or their estates, and to seek further reduction of any Claim, are preserved. Additionally, should the grounds of objection stated in the Objection be dismissed, the Trustee'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.

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

Dated: May ____, 2021
Wilmington, Delaware

THE HONORABLE JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

Proposed Order

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

In re:

INSYS THERAPEUTICS, INC., *et al.*,

Liquidating Debtors.¹

Chapter 11

Case No. 19-11292 (JTD)

(Jointly Administered)

Re: _____

**ORDER GRANTING ELEVENTH OMNIBUS OBJECTION OF THE TRUSTEE OF
THE INSYS LIQUIDATION TRUST TO CLAIMS (SUBSTANTIVE)**
(Equity Interests Claims)

Upon the *Eleventh Omnibus Objection of the Trustee of the Insys Liquidation Trust to Claims* (the “Objection”) for entry of an order disallowing and expunging in their entirety the claims set forth on Exhibit 1 hereto (each a “Claim” and collectively, the “Claims”), all as more fully set forth in the Objection; and upon the *Declaration of Edward A. Phillips Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Eleventh Omnibus Objection of the Trustee of the Insys Liquidation Trust to Claims* 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

¹ The Liquidating Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

Court having 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. Each holder of a Claim listed on **Exhibit 1** attached hereto was properly and timely served with a copy of the Objection and all of its accompanying exhibits and notice of a hearing on the Objection and response deadline,

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

C. The relief requested in the Objection is in the best interests of the Liquidation Trust, its beneficiaries, the Debtors, their estates, their creditors, 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 Claims listed on **Exhibit 1** attached hereto are hereby reclassified as Class 13 Equity Interests and disallowed in their entirety.
3. Epiq Corporate Restructuring, LLC is authorized and directed to expunge the Claims on the official claims registry pursuant to this Order and to make other changes to the official claims registry as necessary to reflect the terms of this Order.
4. Each Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each Claim. Any stay of this Order pending appeal by any of the claimants whose Claims are subject to this Order 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.

5. Nothing contained in the Objection or this Order is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors or its estates, (ii) waiver of rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of rights under Bankruptcy Code or any applicable non-bankruptcy law, (iv) an agreement or obligation to pay any claims, or (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder.

6. The Trustee's rights to amend, modify, or supplement the Objection, to file additional objections to the Claims, any other claims (filed or not) which have or may be asserted against the Debtors or their estates, and to seek further reduction of any Claim, are preserved. Additionally, should the grounds of objection stated in the Objection be dismissed, the Trustee'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.

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

Dated: May ____, 2021
Wilmington, Delaware

THE HONORABLE JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
HAYNES, CLAYTON	10146	Insys Therapeutics, Inc.	\$1,698.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HERRINGTON FINANCIAL SERVICES INC	10046	Insys Therapeutics, Inc.	\$733.99	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HIGGINS, PATRICIA D	10125	Insys Therapeutics, Inc.	\$1,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HO, ICHEN & CHING FANG	321	DEBTOR NOT INDICATED BY CLAIMANT	\$8,622.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HO, PHONG H	199	Insys Therapeutics, Inc.	\$13,832.82	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HOFFMAN, TONY	542	DEBTOR NOT INDICATED BY CLAIMANT	\$37,323.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HOGG, NICHOLAS	657	DEBTOR NOT INDICATED BY CLAIMANT	\$3,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HORNE, ZACHARY D	69	DEBTOR NOT INDICATED BY CLAIMANT	\$489.65	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HORNISCHER, JEFF	243	Insys Therapeutics, Inc.	\$332.15	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HORSKY, JONAS B	11530	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HOSSEINI, HAMID SEYEDOL	549	DEBTOR NOT INDICATED BY CLAIMANT	\$1,329.23	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
HUGHES, DEAN	10126	Insys Therapeutics, Inc.	\$16,607.40	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HUGHES, DEAN & JENNIFER	10127	Insys Therapeutics, Inc.	\$11,069.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HUI, CATHERINE	136	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
HUTCHISON, SHARON D	653	Insys Therapeutics, Inc.	\$1,217.09	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
ISOM, DAWN CHARNETTE	10031	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
ITANI, NORMA JEAN	10619	Insys Therapeutics, Inc.	\$7,304.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JABLONSKI, STEVEN A	10269	Insys Therapeutics, Inc.	\$319.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JACOB, JAMES	1792	DEBTOR NOT INDICATED BY CLAIMANT	\$9,550.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JACOBS, BRIAN	10074	Insys Therapeutics, Inc.	\$1,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JENKINS, KATHLEEN R	11600	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JENSEN, DALE	10189	Insys Therapeutics, Inc.	\$11,267.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
JIANG, HUIJING GU	10075	Insys Therapeutics, Inc.	\$826.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JODY NOBLE & CHARLES ALEXANDER JR JTWROS	10442	Insys Therapeutics, Inc.	\$302.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JOE WHITE LIVING TRUST	67	DEBTOR NOT INDICATED BY CLAIMANT	\$5,079.25	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JOHNSEN, CLIFFORD	56	DEBTOR NOT INDICATED BY CLAIMANT	\$233.20	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JOHNSON, ADRIAN	10644	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JOHNSON, BAMBI	10611	Insys Therapeutics, Inc.	\$2,799.00	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JOHNSON, BRANDON C	10268	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JOHNSON, DONNA S	318	DEBTOR NOT INDICATED BY CLAIMANT	\$500.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JONES, RICHARD E	84	DEBTOR NOT INDICATED BY CLAIMANT	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
JORDAN, CRISSE	564	DEBTOR NOT INDICATED BY CLAIMANT	\$2,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KADAMS/CADAMS TRUST T ADAMS DTD 6/28/17	10180	Insys Therapeutics, Inc.	\$1,009.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
KARANDIKAR, SHUBHANGI	10070	Insys Therapeutics, Inc.	\$358.68	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KARPINSKI, TADEUSZ	446	Insys Therapeutics, Inc.	\$2,459.30	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KARTCH, MARTIN E	152	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KASANA, ANDREJ	570	Insys Therapeutics, Inc.	\$378.75	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KATWARU, MYNAWATI	12210	Insys Therapeutics, Inc.	\$300.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KEMP, NATHANIEL	10534	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KENNEDY, DENNIS	151	DEBTOR NOT INDICATED BY CLAIMANT	\$4,933.85	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KENNETH W ZATKOFF IRA ROLLOVER	105	Insys Therapeutics, Inc.	\$29,670.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KERPAN, DANIEL FRANK, JR	73	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KERSHAW, BRIAN	158	Insys Therapeutics, Inc.	Unliquidated	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KHECHADORIAN, ADRINEH	336	DEBTOR NOT INDICATED BY CLAIMANT	\$1,237.00	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
KIMELMAN, SAM N AND JESSICA S	2285	Insys Therapeutics, Inc.	\$519.75	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KING, JERRY J	171	DEBTOR NOT INDICATED BY CLAIMANT	\$2,100.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KIRCHGRABER, KYLE	10156	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KIRPES, LARRY R	112	DEBTOR NOT INDICATED BY CLAIMANT	\$7,851.59	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KLEIN, PETER	10824	Insys Therapeutics, Inc.	\$1,152.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KOSSOK, NORBERT	12144	Insys Pharma, Inc.	\$8,501.34	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KOTULA, STEPHANIE	197	DEBTOR NOT INDICATED BY CLAIMANT	\$584.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KREMER, JEFFREY C	238	CLAIM ASSERTED AGAINST ALL DEBTORS	\$771.40	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KUBELSKY, JANICE F	442	DEBTOR NOT INDICATED BY CLAIMANT	\$95.90	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
KUELLES, KEITH	128	Insys Therapeutics, Inc.	\$14,230.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LAKETA, DON	255	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
LAM, BEN	12175	Insys Therapeutics, Inc.	\$43,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LANTER, EDWARD C	149	DEBTOR NOT INDICATED BY CLAIMANT	\$5,557.58	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LARUE SWEET & JOHN STARK	175	Insys Therapeutics, Inc.	\$122.40	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LAVENTURE, CARMENE C	183	DEBTOR NOT INDICATED BY CLAIMANT	\$346.82	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LE, FUJI	10043	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LEAK, STEPHANIE & CARL	12232	Insys Therapeutics, Inc.	\$33.08	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LEE, HENRY NC	74	DEBTOR NOT INDICATED BY CLAIMANT	\$10,130.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LEGWOLD, ROCKY L	116	DEBTOR NOT INDICATED BY CLAIMANT	\$200.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LEONG, LELA	164	Insys Therapeutics, Inc.	\$7,211.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LI, VIVIAN Y	134	Insys Therapeutics, Inc.	\$24,544.75	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LI, VIVIAN Y	2274	Insys Therapeutics, Inc.	\$24,544.75	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
LI, VIVIAN YIP	120	Insys Therapeutics, Inc.	\$4,224.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LI, VIVIAN YIP	2273	Insys Therapeutics, Inc.	\$4,224.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LINARES, ART & PEGGY	92	DEBTOR NOT INDICATED BY CLAIMANT	\$106.55	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LINO, CLINE ESBERT	85	DEBTOR NOT INDICATED BY CLAIMANT	\$74.62	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LOOMIS, TONI MARIE	10144	Insys Therapeutics, Inc.	\$162.29	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LUANNE M HINSHAW FAMILY TRUST	10059	Insys Therapeutics, Inc.	\$10,520.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LUU, HIEN	10578	Insys Therapeutics, Inc.	\$8,904.50	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
LUU, TINH	10590	Insys Therapeutics, Inc.	\$2,739.45	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MAHONEY, JAMES P	659	Insys Therapeutics, Inc.	\$587.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MAI, EMILY	119	CLAIM ASSERTED AGAINST ALL DEBTORS	\$611.00	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MAIROSE, STEVEN DONALD	572	DEBTOR NOT INDICATED BY CLAIMANT	\$24,003.75	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
MANEELY, SEAN	458	Insys Therapeutics, Inc.	\$10,776.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MANN, RICHARD	10226	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MARILYN C HARMA REV TRUST DTD 10/17/1991	125	Insys Therapeutics, Inc.	\$20,056.08	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MARJORIE J BLEIWEIS FAMILY TRUST	264	DEBTOR NOT INDICATED BY CLAIMANT	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MARKO, LARRY & LINDA	65	DEBTOR NOT INDICATED BY CLAIMANT	\$5,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MARQUES, DANIEL	10132	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MARTINELLI, JOSEPH ANTHONY	885	Insys Therapeutics, Inc.	\$2,000.00	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MASLANKA, JEFFREY	10034	Insys Therapeutics, Inc.	\$1,877.85	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MATERIA, GIOVANNI	141	DEBTOR NOT INDICATED BY CLAIMANT	\$2,094.95	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MATT, JAMES H	2284	DEBTOR NOT INDICATED BY CLAIMANT	\$1,377.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MCCALLA, JOANNE	10048	Insys Therapeutics, Inc.	\$497.20	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
MCCULLEN, NEWLYN	173	Insys Therapeutics, Inc.	\$420.45 \$79.55	General unsecured Administrative	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MCCUSKER, MERCY ANN	10184	Insys Therapeutics, Inc.	\$250.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MCFARLAND, MICHAEL OGDEN	334	DEBTOR NOT INDICATED BY CLAIMANT	\$212.71	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MCGUIGAN, SUSAN J	46	DEBTOR NOT INDICATED BY CLAIMANT	\$1,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MEMMEL, LINDA	143	DEBTOR NOT INDICATED BY CLAIMANT	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MENASE, ABEBA	249	DEBTOR NOT INDICATED BY CLAIMANT	\$5,167.95	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MICHAELIS, JOY	10687	Insys Therapeutics, Inc.	\$40.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MILLER, CHESTER D	55	DEBTOR NOT INDICATED BY CLAIMANT	\$1,456.31	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MILLER, CLARK	10586	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MILOSZ, GRAHAM	267	DEBTOR NOT INDICATED BY CLAIMANT	\$15,480.00	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MIRAGLIA, RON A	172	CLAIM ASSERTED AGAINST ALL DEBTORS	Unliquidated	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
MOATTARI, BABAK	140	DEBTOR NOT INDICATED BY CLAIMANT	\$4,838.90	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MOHAMMED, BASHA I	10050	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MONCADA, JOSE	10183	Insys Therapeutics, Inc.	\$136.50	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MONTANA MONEY INVESTMENT CLUB	10375	Insys Therapeutics, Inc.	\$635.79	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MONZI, JOSEPH S JR	1719	Insys Therapeutics, Inc.	\$639.45	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MOORE, BRETT	1383	DEBTOR NOT INDICATED BY CLAIMANT	\$3,274.79	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MOSON-HELLER, PATRICIA	2281	Insys Therapeutics, Inc.	\$3,697.59	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MOTIWALA, ABDUL RAZZAK	10089	Insys Therapeutics, Inc.	\$9,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MOUSALLAM, ADIB	236	DEBTOR NOT INDICATED BY CLAIMANT	\$1,042.46	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MUCHA, DIANA VIOLET VOGL	10605	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MULLANE, MICHELE	89	DEBTOR NOT INDICATED BY CLAIMANT	\$501.90	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
MULVEY, MICHAEL	10098	Insys Therapeutics, Inc.	\$314.72	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MURPHY, CONNIE	88	Insys Therapeutics, Inc.	\$231.41	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MURPHY, TIMOTHY M	540	DEBTOR NOT INDICATED BY CLAIMANT	\$378.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MUYLLE, ROBYN	10607	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
MYERS, DONALD C JR	153	DEBTOR NOT INDICATED BY CLAIMANT	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NEITZKE, BRIAN ADAM	10188	Insys Therapeutics, Inc.	\$841.92	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NERDAHL, KARLA	118	DEBTOR NOT INDICATED BY CLAIMANT	\$482.51	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NEWTON, SHELIA	260	DEBTOR NOT INDICATED BY CLAIMANT	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NGO, CYAN	10124	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NGUYEN, IRVIN Q	10661	Insys Therapeutics, Inc.	\$1,192.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NGUYEN, LINDA	454	Insys Therapeutics, Inc.	\$15,432.05	Secured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
NORWOOD, LISA	10157	Insys Therapeutics, Inc.	\$212.03	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NOTTER, MARIANNE H	91	DEBTOR NOT INDICATED BY CLAIMANT	\$2,492.64	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
NUNN, EILEEN R.	71	Insys Therapeutics, Inc.	\$105.60	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
O'BARTO, DAVID	193	DEBTOR NOT INDICATED BY CLAIMANT	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
OGAWA, JOAHN	10078	Insys Therapeutics, Inc.	\$150.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
OGLE, KIMBERLY	251	DEBTOR NOT INDICATED BY CLAIMANT	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
OKAMURA, LEA	655	DEBTOR NOT INDICATED BY CLAIMANT	\$54,749.30	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
OLENIK, RENEE J & STEVEN C JR	464	DEBTOR NOT INDICATED BY CLAIMANT	\$3,768.50	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
OVERTON, FRANK	11654	Insys Therapeutics, Inc.	\$6,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
OWENS, JASON	63	DEBTOR NOT INDICATED BY CLAIMANT	\$411.27	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
OXENDINE, LISA	11674	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
PADILLA, STEPHANIE L	132	DEBTOR NOT INDICATED BY CLAIMANT	\$4,062.40	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PANAGOPOULOS, GEORGIA	455	DEBTOR NOT INDICATED BY CLAIMANT	\$14,715.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PARIKH, MANISH A	12178	Insys Therapeutics, Inc.	\$8,500.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PARK, JEE YOUNG SOPHIA	70	DEBTOR NOT INDICATED BY CLAIMANT	\$4,584.19	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PATIO LIVING CONCEPTS 401K	156	DEBTOR NOT INDICATED BY CLAIMANT	\$4,000.00	Administrative	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PAVLICEK, LELAND AND MICHELE	154	DEBTOR NOT INDICATED BY CLAIMANT	\$165.55	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PEILA, ROBERT J	332	DEBTOR NOT INDICATED BY CLAIMANT	\$1,374.50	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PEKARSKAJA, OLGA	10105	Insys Therapeutics, Inc.	\$197.11	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PETER, DAVINA E	453	DEBTOR NOT INDICATED BY CLAIMANT	\$995.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PETRONE, CARRIE	656	Insys Therapeutics, Inc.	\$3,162.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PFALZER, HENRY	123	DEBTOR NOT INDICATED BY CLAIMANT	\$4,900.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

11th Omnibus Claims Objection

Exhibit 1 - Equity Interests Claims

Name of Claimant	Claim Number	Debtor	Asserted Claim Amount	Asserted Claim Classification	Reason for Reclassification to Class 13 Equity Interest and Disallowance
PILLA, GUY T III	10173	Insys Therapeutics, Inc.	\$2,172.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PINNEY, REBECCA	1381	Insys Therapeutics, Inc.	\$25,000.00	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PITCHFORD, FOLAYAN CARTER	263	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
PORTER, TATIANA MANGENI	2288	Insys Therapeutics, Inc.	\$593.31	General unsecured	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
RABANAL, STEPHEN	10638	Insys Therapeutics, Inc.	Unliquidated	Unknown	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
SALEMI, JAMES G	157	DEBTOR NOT INDICATED BY CLAIMANT	\$5,000.00	Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.
SIMPSON, LATASHA NICOLE	1767	DEBTOR NOT INDICATED BY CLAIMANT	\$20,000,000.00 \$40,000,000.00	Administrative Priority	The claimant asserts an equity interest in one or more of the Debtors. Equity Interests were cancelled as of the Effective Date and as such, the claimant is not entitled to receive any distributions in the cases under the Plan.

Exhibit B

Phillips Declaration

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

In re:

INSYS THERAPEUTICS, INC., *et al.*,

Liquidating Debtors.¹

Chapter 11

Case No. 19-11292 (JTD)

(Jointly Administered)

**DECLARATION OF EDWARD A. PHILLIPS PURSUANT TO 28 U.S.C. § 1746 AND
LOCAL RULE 3007-1 IN SUPPORT OF ELEVENTH OMNIBUS OBJECTION OF THE
TRUSTEE OF THE INSYS LIQUIDATION TRUST TO CLAIMS (SUBSTANTIVE)
(Equity Interests Claims)**

Edward A. Phillips, under penalty of perjury hereby declares as follows:

1. I am Managing Director of Getzler Henrich & Associates LLC (“Getzler Henrich”). My professional credentials include: Certified Turnaround Professional; Certified Insolvency & Restructuring Advisor; Certified Fraud Examiner; Certified in Financial Forensics; and Certified Public Account. I have more than 25 years of experience in finding solutions to problems in restructuring, insolvency, liquidation, and forensic accounting matters. I have advised a variety of parties and functioned in numerous roles in bankruptcy proceedings, out-of-court restructurings, forensic accounting engagements and post-confirmation engagements.

2. I submit this declaration in support of the *Eleventh Omnibus Objection of the Trustee of the Insys Liquidation Trust to Claims (Substantive)* (the “Objection”).

3. Getzler Henrich serves as the financial advisor to the Insys Liquidation Trust (the “Trust”) and Mr. William Henrich, the Trustee of the Trust and has been working in these cases since the Effective Date². I am the primary Getzler Henrich professional responsible for

¹ The Liquidating Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

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

overseeing the claims analysis process. Additionally, I also consult with the Debtors' former Chief Financial Officer and Director of Accounting who currently act as consultants to the Trust and have firsthand knowledge of the Debtors' books and records (the "Books and Records"). As such, I have gained significant familiarity of the Books and Records and their Schedules.

4. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, my review (or the review of Trust's counsel, Epiq, and/or Trust's consultants 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 Epiq, the claims and noticing agent in these cases. The objections set forth in the Objection are based on the review conducted. I have personally reviewed the Objection and to the best of my knowledge and belief, the information contained on Exhibit 1 to the Objection is true and correct.

5. I and/or the Trust's counsel the reviewed all of the Claims identified in Exhibit 1 to the Objection and the supporting documentation, if any, filed with the Claims, and have determined that the Claims were filed by holders of equity interests. Therefore, the Claims should be reclassified as a Class 13 Equity Interests and under the Plan, Equity Interests were deemed cancelled and as of the Effective Date. As such, the Claims should be disallowed in their entirety.

6. Based on the foregoing, and to the best of my knowledge, information and belief, the information contained in the Objection and exhibits 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: April 19, 2021

/s/ Edward A. Phillips
Edward A. Phillips

SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION. CLAIMANTS RECEIVING THIS OBJECTION SHOULD REVIEW IT TO SEE IF THEIR NAMES APPEAR ON THE EXHIBIT ATTACHED HERETO TO DETERMINE WHETHER THE OBJECTION AFFECTS THEIR CLAIMS. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE TRUSTEE'S COUNSEL, MATTHEW MURRAY AT 212-765-9100 EXT. 108 OR BY EMAIL MMURRAY@HALPERINLAW.NET

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

In re:

INSYS THERAPEUTICS, INC., *et al.*,

Liquidating Debtors.¹

Chapter 11

Case No. 19-11292 (JTD)

(Jointly Administered)

Hearing Date: May 19, 2021 at 11:00 a.m. (ET)

Objection Deadline: May 12, 2021 at 4:00 p.m. (ET)

**NOTICE OF ELEVENTH OMNIBUS OBJECTION OF THE TRUSTEE OF
THE INSYS LIQUIDATION TRUST TO CLAIMS (SUBSTANTIVE)
(Equity Interests Claims)**

PLEASE TAKE NOTICE that today, William Henrich, in his capacity as liquidating trustee (the "Trustee") of the Insys Liquidation Trust (the "Liquidation Trust"), filed the *Eleventh Omnibus Objection of the Trustee of The Insys Liquidation Trust to Claims (Substantive) (Equity Interests Claims)* (the "Objection").

PLEASE TAKE FURTHER NOTICE that to contest this Objection, a holder of a Claim must file and serve a written response to this Objection (a "Response") so that it is received no later than **4:00 p.m. (Eastern Time) on May 12, 2021 at 4:00 p.m.** (the "Response Deadline"). Claimants should read the Proposed Order and Exhibits attached carefully.

PLEASE TAKE FURTHER NOTICE THAT only responses made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE THAT every Response should be filed with the Office of the Clerk, United States Bankruptcy Court for the District of Delaware, 824 Market

¹ The Liquidating Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

Street, 3rd Floor, Wilmington, Delaware 19801; and served upon the following, so that the Response is received no later than the Response Deadline at the following addresses:

HALPERIN BATTAGLIA BENZIJA, LLP
Ligee Gu
40 Wall Street, 37th Floor
New York, NY 10005
lgu@halperinlaw.net

-and-

MORRIS, NICOLS, ARSHT & TUNNELL LLP
Matt Talmo
1201 North Market Street
PO Box 1347
Wilmington, DE 19899
mtalmo@morrishichols.com

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 Debtor, 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 amount of the disputed claim;
- (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 Bankruptcy Court or the 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.

Timely Response Required. If a claimant fails to file and serve a timely Response, then without further notice to the claimant or a hearing, the Trustee will present to the Court an order, substantially in the form of the order attached hereto. IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON **MAY 19, 2021 at 11:00 a.m. (ET)** VIA VIDEOCONFERENCE BEFORE THE HONORABLE JOHN T. DORSEY OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE.

Dated: April 19, 2021

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Matthew O. Talmo

Derek C. Abbott (No. 3376)
Matthew O. Talmo (No. 6333)
1201 N. Market Street, 16th Floor
P.O. Box 1347
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-and-

**HALPERIN BATTAGLIA BENZIJA,
LLP**

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*Counsel to the Trustee of the Insys
Liquidation Trust*