

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re

INSYS THERAPEUTICS INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-11292 (KG)

(Jointly Administered)

Re: D.I. 5, 49, 231, 475 and 482

**NON-MDL MUNICIPAL PLAINTIFFS' JOINDER IN
STATEMENT AND LIMITED OBJECTION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
MOTION OF DEBTORS PURSUANT TO 11 U.S.C. §§ 105(A), 363
AND 507(A) FOR (I) AUTHORITY TO (A) PAY CERTAIN PREPETITION
WAGES AND REIMBURSABLE EMPLOYEE EXPENSES, (B) PAY AND
HONOR EMPLOYEE MEDICAL AND OTHER BENEFITS, AND
(C) CONTINUE EMPLOYEE BENEFITS PROGRAMS, AND (II) RELATED RELIEF**

Certain non-MDL municipal plaintiffs (the “Non-MDL Municipal Plaintiffs”)² hereby file this joinder (the “Joinder”) in the Official Committee of Unsecured Creditors’ statement and limited objection [D.I. 482] (the “Limited Objection”) to the relief related to severance payments to be approved by a further order regarding the *Motion of Debtors Pursuant to 11 U.S.C. Sections 105(a), 363 and 507(a) for (I) Authority to (A) Pay Certain Prepetition Wages and Reimbursable Employee Expenses, (B) Pay and Honor Employee Medical and Other Benefits, and (C) Continue Employee Benefits Programs, and (II) Related Relief* [D.I. 5] (the “Wages Motion”). In support of this Joinder, the Non-MDL Municipal Plaintiffs respectfully state as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Insys Therapeutics (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). The Debtors’ mailing address is 1333 South Spectrum Blvd #100, Chandler, Arizona 85286.

² A list of the Non-MDL Municipal Plaintiffs is attached hereto as **Exhibit A**.

BACKGROUND

1. On June 10, 2019 (the "Petition Date"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.
2. On the Petition Date, the Debtors filed the Wages Motion.
3. On August 19, 2019, the Debtors filed a statement in support of a postpetition severance program as a supplement to and in connection with the Wages Motion [D.I. 475].
4. On August 20, 2019, the UCC filed the Limited Objection.

JOINDER

5. The Non-MDL Municipal Plaintiffs hereby join in the arguments raised in the Limited Objection and expressly adopt, raise, and incorporate such arguments therein, as if fully set forth herein.

WHEREFORE, the Non-MDL Municipal Plaintiffs respectfully request that the Court: (i) sustain the Limited Objection; and (ii) grant such other relief as the Court deems just and proper.

Dated: August 20, 2019
Wilmington, Delaware

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EXHIBIT A

Caption	Plaintiffs
City of Dover, et al. v Purdue Pharma, LP, et al.	City of Dover, DE
City of Dover, et al. v Purdue Pharma, LP, et al.	City of Seaford, DE
City of Dover, et al. v Purdue Pharma, LP, et al.	County of Kent, DE
Noble County, Ohio by the Noble County Commissioners v. Cardinal Health	Noble County, OH
Meigs County, Ohio v. Cardinal Health Inc., et al.	Meigs County, OH
Washington County, Ohio by its Commissioners, et al. v. Cardinal Health	Washington County, OH
Washington County, Ohio by its Commissioners, et al. v. Cardinal Health	City of Marietta, OH
County of Armstrong v Purdue Pharma, LP, et al.	Armstrong, County, PA
County of Beaver v Purdue Pharma, LP, et al.	Beaver County, PA
County of Bradford v Purdue Pharma, LP, et al.	Bradford County, PA
County of Cambria v Purdue Pharma, LP, et al.	Cambria County, PA
County of Carbon v Purdue Pharma, LP, et al.	Carbon County, PA
County of Clarion v Purdue Pharma, LP, et al.	Clarion County, PA
County of Fayette v Purdue Pharma, LP, et al.	Fayette County, PA
County of Franklin v Purdue Pharma, LP, et al.	Franklin County, PA
County of Greene v Purdue Pharma, LP, et al.	Greene County, PA
County of Huntingdon v Purdue Pharma, LP, et al.	Huntingdon County, PA
County of Lackawanna v Purdue Pharma, LP, et al.	Lackawanna County, PA
County of Lawrence v Purdue Pharma, LP, et al.	Lawrence County, PA
County of Monroe v Purdue Pharma, LP, et al.	Monroe County, PA
Township of Bensalem v Purdue Pharma, LP, et al.	Bensalem, PA
County of Washington v Purdue Pharma, LP, et al.	Washington County, PA
County of Westmoreland v Purdue Pharma, LP, et al.	Westmoreland County, PA
Municipality of Norristown v Purdue Pharma, LP, et al.	Municipality of Norristown, PA
Newtown Township v Purdue Pharma, LP, et al.	Newtown, PA
Sheet Metal Workers' Local Union No. 19 Health Fund	Philadelphia, PA
Municipality of Norristown v Purdue Pharma, LP, et al.	West Norriton, PA
County of Abbeville v. Rite Aid of South Carolina, et al	Abbeville County, SC
County of Aiken v. Rite Aid of South Carolina, et al.	Aiken County, SC
County of Allendale v. Rite Aid of South Carolina, et al	Allendale County, SC
County of Anderson v. Rite Aid of South Carolina, et al	Anderson County, SC
County of Bamberg v. Rite Aid of South Carolina, et al	Bamberg County, SC
County of Barnwell v. Rite Aid of South Carolina, et al	Barnwell County, SC
County of Beaufort v. Rite Aid of South Carolina, et al	Beaufort County, SC
County of Calhoun v. Rite Aid of South Carolina, et al	Calhoun County, SC
County of Cherokee v. Rite Aid of South Carolina, et al	Cherokee County, SC
County of Chesterfield v. Rite Aid of South Carolina, et al	Chesterfield County, SC
County of Clarendon v. Rite Aid of South Carolina, et al	Clarendon County, SC
County of Colleton v. Rite Aid of South Carolina, et al	Colleton County, SC
County of Dillon v. Rite Aid of South Carolina, et al	Dillon County, SC
County of Dorchester v. Rite Aid of South Carolina, et al	Dorchester County, SC
County of Edgefield v. Rite Aid of South Carolina, et al	Edgefield County, SC
County of Fairfield v. Rite Aid of South Carolina, et al	Fairfield County, SC
County of Greenville v. Rite Aid of South Carolina, et al	Greenville County, SC
County of Greenwood v. Rite Aid of South Carolina, et al	Greenwood County, SC
County of Hampton v. Rite Aid of South Carolina, et al	Hampton County, SC
County of Horry v. Rite Aid of South Carolina, et al	Horry County, SC
County of Jasper v. Rite Aid of South Carolina, et al	Jasper County, SC
County of Kershaw, et al. v. Rite Aid of South Carolina, et al	County of Kershaw, Kershaw County Hospital Board A/K.A Kershaw Health D/B/A Health Service District of Kershaw County.
County of Lancaster v. Rite Aid of South Carolina, et al	Lancaster County, SC
County of Laurens v. Rite Aid of South Carolina, et al	Laurens County, SC
County of Lee v. Rite Aid of South Carolina, et al	Lee County, SC
County of Marion v. Rite Aid of South Carolina, et al	Marion County, SC
County of McCormick v. Rite Aid of South Carolina, et al	McCormick County, SC
City of Myrtle Beach v. Rite Aid of South Carolina, et al	City of Myrtle Beach, SC
County of Newberry v. Rite Aid of South Carolina, et al	Newberry County, SC
County of Oconee v. Rite Aid of South Carolina, et al	Oconee County, SC
County of Orangeburg v. Rite Aid of South Carolina, et al	Orangeburg County, SC
County of Pickens v. Rite Aid of South Carolina, et al	Pickens County, SC
County of Saluda v. Rite Aid of South Carolina, et al	Saluda County, SC
County of Spartanburg v. Rite Aid of South Carolina, et al	Spartanburg County, SC
County of Sumter v. Rite Aid of South Carolina, et al	Sumter County, SC
County of Union v. Rite Aid of South Carolina, et al	Union County, SC
County of Williamsburg v. Rite Aid of South Carolina, et al	Williamsburg County, SC
County of York v. Rite Aid of South Carolina, et al	York County, SC
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	Pleasants County, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	City of St. Marys, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	Ritchie County, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	Town of Harrisville, WV
WV Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	Town of Elizabeth, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	City of Ravenswood, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	City of Ripley, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	City of Spencer, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	City of Williamstown, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	County of Jackson, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	County of Roane, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	County of Wirt, WV
Roane County Commission v. Mylan Pharmaceuticals, Inc., et al.	County of Wood, WV