

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

*In re:*

INSYS THERAPEUTICS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-11292 (KG)

Jointly Administered

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

**THE STATE OF FLORIDA’S JOINDER IN THE STATEMENT AND LIMITED  
OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
TO MOTION OF THE 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 BENEFIT PROGRAMS AND (II) RELATED RELIEF**

Creditor, the State of Florida (the “State”), by and through its undersigned counsel, joins in the *Statement and Limited Objection of the Official Committee of Unsecured Creditors to Motion of the 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 Benefit Programs, and (II) Related Relief* [D.I. 482] (the “Committee Limited Objection”)<sup>2</sup> filed by the Official Committee of Unsecured Creditors (the “Committee”) of Insys Therapeutics, Inc. and its affiliated debtors and debtors in possession (collectively, the “Debtors”), and in support of this joinder (the “Joinder”), respectfully states as follows:

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<sup>1</sup> 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, 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). The Debtors’ mailing address is 1333 South Spectrum Blvd #100, Chandler, Arizona 85286.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Committee Limited Objection.

**JOINDER**

1. The State joins in the arguments raised in the Committee Limited Objection and adopts and incorporates such arguments as if fully set forth herein.

2. The State respectfully requests that the Court deny the relief sought in the Wages Motion with respect to the Severance Program for the reasons articulated in the Committee Limited Objection and require the Debtors to make the acknowledgements and disclosures requested by the Committee prior to approving any payments under the Debtors' proposed Severance Program.

**RESERVATION OF RIGHTS**

3. The State reserves the right to modify and supplement this Joinder at any time, including at any hearing to consider the Wages Motion, the Severance Program, and the Committee Limited Objection.

Respectfully submitted on August 20, 2019 by:

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**Attorney General**

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/s/ Russell Kent

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