

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re:	:	Chapter 11
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INSYS THERAPEUTICS, INC., et al.,	:	Case No. 19-11292 (KG)
	:	
Debtors.	:	Jointly Administered
	:	
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JOINDER OF THE STATE OF NEW JERSEY TO 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

To the Honorable Kevin Gross, United States Bankruptcy Judge:

The Attorney General for the State of New Jersey, a creditor and party-in-interest in this action, hereby joins the 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 (the “Limited Objection”) (ECF No. 482), filed by the Official Committee of Unsecured Creditors (the “Committee”) on August 20, 2019, stating as follows:

1. The Attorney General for the State of New Jersey joins in the Committee’s Limited Objection to the proposed Severance Program (as defined in the Limited Objection).

WHEREFORE, the State of New Jersey, through its Attorney General, requests that the Court deny the Debtors' request, without prejudice to the Debtors seeking authority for a severance program that addresses the concerns raised here and in the Committee's Limited Objection, on proper notice, opportunity to object and a hearing.

Dated: August 20, 2019
Wilmington, Delaware

GURBIR S. GREWAL
Attorney General of the State of New Jersey

By: /s/ Lara J. Fogel
Lara J. Fogel, *pro hac vice*
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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, 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.

CERTIFICATE OF SERVICE

The undersigned certifies that on August 20, 2019, a true and correct copy of this document was served by electronic mail through the Court's CM/ECF system to all parties who are deemed to have consented to electronic service.

/s/ Lara J. Fogel

Lara J. Fogel