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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Avadel Specialty Pharmaceuticals, LLC, ¹	Case No. 19-10248 (CSS)
Debtor.	

CERTIFICATE OF NO OBJECTION TO PLAN
ADMINISTRATOR'S SECOND OMNIBUS (NON-SUBSTANTIVE)
OBJECTION TO CERTAIN CLAIMS PURSUANT TO
BANKRUPTCY CODE SECTIONS 502(B) AND 503(B),
BANKRUPTCY RULES 3003 AND 3007, AND LOCAL RULE 3007-1
(DUPLICATE AND AMENDED AND RESTATED)

The undersigned counsel to Karrilyn Thomas of MCA Financial Group, Ltd., solely in her capacity as the plan administrator (the "Plan Administrator") in the above-captioned case hereby certifies that:

- 1. On July 19, 2021, the Plan Administrator filed the *Plan Administrator's Second Omnibus (Non-Substantive) Objection to Certain Claims Pursuant to Bankruptcy Code Sections* 502(B) and 503(B), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 (Duplicate and Amended and Restated) [Docket No. 472] (the "**Objection**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").
- 2. Pursuant to the Notice attached to the Objection, responses or objections to the Objection were to be filed and served no later than August 9, 2021 at 4:00 p.m.
- 3. As of the date hereof, the undersigned counsel has not received any answers, objections or other responsive pleadings to the Objection.

¹ The business address and the last four (4) digits of the Debtor's federal tax identification number is Avadel Specialty Pharmaceuticals, LLC, 16640 Chesterfield Grove Road, Suite 200, Chesterfield, MO 63005 (8959).

4. The Plan Administrator therefore respectfully requests that the Court enter the proposed form of order that was attached to the Objection at its earliest convenience.

Dated: August 10, 2021 Wilmington, Delaware Respectfully submitted,

GREENBERG TRAURIG, LLP

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