

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

In re AIO US, INC., et al., <div style="text-align: center;">Debtors.¹</div>	X : : : : : : : X	Chapter 11 Case No. 24-11836 (CTG) (Jointly Administered) Obj. Deadline: Nov. 19, 2024 at 4:00 p.m. (ET)
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**DECLARATION AND DISCLOSURE STATEMENT OF PETER GLASS,
ON BEHALF OF GLASS.LAW PLLC**

I, Peter Glass, hereby declare, pursuant to section 1746 of title 28 of the United States Code, that the following is true to the best of my knowledge, information, and belief:

1. I am a Principal of glass.law PLLC located at 11 Broadway, Suite 615, New York, NY 10004 (the “Firm”).

2. This declaration (the “**Declaration**”) is submitted in accordance with the *Order Pursuant to 11 U.S.C. §§ 327, 330, and 105(a) Authorizing Debtors to Employ Professionals Used in Ordinary Course of Business* [Docket No. 212] (the “**OCP Order**”). Capitalized terms used herein but not otherwise defined herein shall have the meanings ascribed to such terms in the OCP Order.

3. AIO US, Inc. and its debtor affiliates, as debtors and debtors in possession (collectively, the “Debtors”), have requested that the Firm provide legal advice and services arising from product liability, environmental, and other pending litigation matters, including strategic

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: AIO US, Inc. (9872), Avon Products, Inc. (4597), MI Holdings, Inc. (6450), and Avon Capital Corporation (2219). The Debtors’ mailing and service address is 4 International Drive Suite 110, Rye Brook, New York 10573.

advice and assistance complying with obligations arising from litigation in numerous jurisdictions, to the Debtors, and the Firm has consented to provide such services.

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons who are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties-in-interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, its attorneys, or accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

5. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

6. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates, with respect to the matters on which the Firm is to be retained.

7. Pursuant to Federal Rule of Bankruptcy Procedure 2014(a), I obtained a list of interested parties (the "Interested Parties List") attached hereto as Exhibit 1 from counsel to the Debtors which includes the Debtors, their creditors, other parties in interest, and certain professionals employed in the Chapter 11 Cases (the "Interested Parties") and undertook a search for any connections between the Firm and the Interested Parties. The Firm's review of such

Interested Parties did not identify connections with any Interested Parties, including current and prior representations.

8. The Debtors owe the Firm \$1,192.28 for prepetition services, the payment of which is subject to the limitations contained in the Bankruptcy Code.

9. I also understand the limitations on compensation and reimbursement of expenses under the OCP Order. Specifically, the Firm understands that in the event its fees and expenses exceed a total of \$50,000 per month, on average, over a rolling three-month period, the Firm may be required to file with the Court a fee application for approval of its fees and expenses for such month in accordance with Bankruptcy Code sections 330 and 331, the Bankruptcy Rules, the Local Bankruptcy Rules, and any applicable procedures or orders of this Court.

10. As of the Petition Date, the Firm did not hold a retainer from the Debtors.

11. As of the Petition Date, the Firm was not party to an agreement for indemnification with the Debtors.

12. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 1, 2024

By: _____


Peter Glass