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November 19, 2024

VIA CM/ECF

Honorable Laurie Selber Silverstein
United States Bankruptcy Court
District of Delaware
824 North Market Street, 6th Floor
Wilmington, DE 19801

Re: *In re Solar Biotech, Inc. and its subsidiary, NobleGen Inc.*
Case No.: 24-11402 (LSS)

Dear Judge Silverstein:

On behalf of the above referenced debtors ("Debtors"), I submit this letter to apprise the Court of the status of multiple motions currently pending before the Court, including (i) the Debtors' motion for interim approval of its disclosure statement and plan for solicitation purposes and related relief [D.I. 268] (the "Solicitation Motion"); (ii) the motion by the official committee of unsecured creditors ("Committee") to extend the challenge deadline [D.I. 269] (the "Extension Motion")¹; (iii) Motif FoodWorks, Inc.'s motion for relief from DIP financing orders pursuant to Fed. R. Civ. P. 60 [D.I. 283] (the "Rule 60 Motion")²; and (iv) the Debtors' motion to approve a break-up fee to Ingredion [D.I. 284] (the "Break-up Fee Motion" and, together with the Solicitation Motion, the Extension Motion, and Rule 60 Motion, the "Motions").

With the goal of bringing all of the parties together in an attempt to reach a resolution to the Motions, and to avoid unnecessary dissipation of the proceeds from the Debtors' successful sale, the Debtors suggested adjourning the hearing on the Solicitation Motion, as well as instituting a standstill and extension of responsive pleadings for all pending Motions. In conjunction with that proposal, the Debtors suggested all counsel meet no later than Friday, November 22, to discuss an exchange of information that would be helpful for a settlement conference, with such information to be exchanged no later than Wednesday, November 27. After the information exchange to help foster settlement discussions, the parties' counsel (with clients available by phone) were to hold a settlement conference on Wednesday, December 4, and advise the Court no later than Monday, December 16, as to whether a global settlement was able to be reached.

If the parties were able to reach a global settlement of all issues raised in the Motions, the Debtors suggested utilizing a hearing date of December 23, 2024 (which was open on the Court's calendar as of last week) to conditionally approve the Solicitation Motion. If the parties were not able to reach a global settlement, the

¹ The Extension Motion may be moot in light of the complaint filed last night by the Committee against Ingredion Incorporated ("Ingredion").

² The Debtors reserve any and all rights with respect to the Motions, specifically, with the content of the Rule 60 Motion.

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Debtors suggested removing “a hold” on the December 23 hearing date and obtaining a hearing date acceptable to the Court in January to adjudicate the pending Motions.

The Debtors believe the above-referenced schedule is in the best interest of the estates and represents the best path forward to create a forum for a settlement to occur.

The foregoing is provided to the Court as a written status report, and the Debtors look forward to addressing the above with the Court tomorrow.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John S. Mairo". The signature is fluid and cursive, with the first name "John" and last name "Mairo" clearly distinguishable.

John S. Mairo