



Order Filed on April 17, 2025  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In re:

NOSTRUM LABORATORIES, INC.,

Debtor.

Case No.: 24-19611

Chapter 11

Honorable John K. Sherwood,  
U.S.B.J.

**ORDER APPROVING STIPULATION TO AMEND FINAL ORDER (I) AUTHORIZING  
THE DEBTOR TO UTILIZE CASH COLLATERAL TO (A) PAY POSTPETITION  
ASSOCIATES' WAGES, SALARIES, OTHER COMPENSATION AND  
REIMBURSABLE EXPENSES, (B) CONTINUE THE ASSOCIATE BENEFITS  
PROGRAMS, AND (C) CONTINUE TO PAY KEY VENDORS; AND (II) GRANTING  
RELATED RELIEF**

The Relief set forth on the following pages numbered 2 to four is hereby ORDERED.

**DATED: April 17, 2025**

A handwritten signature in black ink, appearing to read "J.K. Sherwood", written over a horizontal line.

Honorable John K. Sherwood  
United States Bankruptcy Court

Debtor: Nostrum Laboratories, Inc.

Case No.: 24-19611 (JKS)

Caption of Order: Stipulation to Amend Final Order (I) Authorizing the Debtor to (A) Utilize Cash Collateral to Pay Post-petition Associates Wages, Salaries, Other Compensation and Reimbursable Associate Expenses, (B) Continue the Associate Benefits Programs, and (C) Continue to Pay Key Vendors, and (II) Granting Related Relief.

IT IS HEREBY FOUND AND DETERMINED THAT:

The foregoing stipulation between the Debtor and Citizens Bank, N.A. is approved and the Final Order (I) Authorizing the Debtor to Utilize Cash Collateral to (A) Pay Postpetition Associates' Wages, Salaries, Other Compensation and Reimbursable Expenses, (B) Continue The Associate Benefits Programs, And (C) Continue To Pay Key Vendors; And (II) Granting Related Relief (Docket No. 186) (the "**Final Order**") is amended accordingly:

The Debtor and Citizens Bank, N.A. hereby submit this Stipulation (the "**Stipulation to Amend Final Order**") to amend the Final Order (I) Authorizing the Debtor to Utilize Cash Collateral to (A) Pay Postpetition Associates' Wages, Salaries, Other Compensation and Reimbursable Expenses, (B) Continue The Associate Benefits Programs, And (C) Continue To Pay Key Vendors; And (II) Granting Related Relief (Docket No. 186) (the "**Final Order**"),<sup>1</sup> as follows:

1. Section 11 of the Final Order (Carve-Out) is hereby modified such that Section 11(a)(ii) (B)(I) of the Cash Collateral Order shall be amended and restated as follows:

(B)(I) up to \$470,000.00 of unpaid professional fees, expenses and disbursements of approved counsel for the Debtor, as follows, (x) to Ansell, Grimm & Aaron, P.C., which fees, expenses and disbursements shall not exceed \$270,000.00 (after application of any retainer)

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed in the Final Order.

Debtor: Nostrum Laboratories, Inc.

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and (y) to Broege, Neumann, Fischer & Shaver, LLC, which fees, expenses and disbursements shall not exceed \$200,000.00 (after application of any retainer), in each case to the extent allowed by this Court.

2. From and after the date hereof, the Debtor's use of Cash Collateral shall be strictly in accordance with a Budget approved by Prepetition Lender, which Budget must be provided no later than April 14, 2025 at 12:00 p.m. Any deviation from such Budget without Prepetition Lender's prior written consent shall be grounds for immediate termination of the use of Cash Collateral.

3. All provisions of the Final Order not modified by this Stipulation to Amend Final Order shall remain in full force and effect.

4. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Stipulation to Amend Final Order are immediately effective and enforceable upon its entry.

5. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Stipulation to Amend Final Order in accordance with the Cross-Motion.

6. Any and all objections to this Stipulation to Amend Final Order not withdrawn are hereby deemed overruled.

7. Notwithstanding anything in this Stipulation to Amend Final Order to the contrary, all relief granted in this Stipulation to Amend Final Order regarding all persons to receive payment from the Debtor, including but not limited to Associate employees, executives, anyone engaged in the Debtor's employ as a 1099 employee, and all insiders, is limited to the statutory caps as set

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forth in sections 507(a)(4) and (a)(5) of the Bankruptcy Code.

8. Notwithstanding anything in the Final Order or this Stipulation to Amend the Final to the contrary, this Stipulation to Amend Final Order does not authorize the Debtor to make any payment to any insider (as such term is defined under the Bankruptcy Code), officer or executive of the Debtor.

9. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of the Final Order, as amended by this Stipulation to Amend Final Order.

Broege, Neumann, Fischer & Shaver, LLC

Stradley Ronon Stevens & Young , LLP

/s/ Timothy P. Neumann

/s/ Julie M. Murphy

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