



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

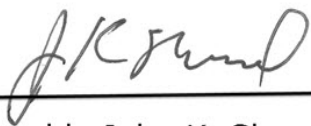
Chapter 11

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



Honorable John K. Sherwood
United States Bankruptcy Court

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**"),¹ 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)

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

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

Case No.: 24-19611 (JKS)

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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

Timothy P. Neumann, Esq.

Julie M. Murphy, Esq.

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Attorneys for the Debtor, Nostrum Laboratories, Inc. Attorneys for Citizens Bank, N.A.

In re:
Nostrum Laboratories, Inc.
Debtor

Case No. 24-19611-JKS
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0312-2
Date Rcvd: Apr 17, 2025

User: admin
Form ID: pdf903

Page 1 of 3
Total Noticed: 2

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 19, 2025:

Recip ID	Recipient Name and Address
db	+ Nostrum Laboratories, Inc., 1800 N. Topping Avenue, Kansas City, MO 64120-1228
aty	+ Broege, Neumann, Fischer & Shaver, LLC, 25 Abe Voorhees Drive, Manasquan, NJ 08736-3560

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Apr 19, 2025 Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 17, 2025 at the address(es) listed below:

Name	Email Address
Anthony J D'Artiglio	on behalf of Interested Party Ansell Grimm & Aaron P.C. ADARTIGLIO@ANSELL.LAW, courtfilings@ansellgrimm.com
Anthony J D'Artiglio	on behalf of Interested Party Anthony J D'Artiglio ADARTIGLIO@ANSELL.LAW courtfilings@ansellgrimm.com
Brian Moore	on behalf of Creditor Vintage Pharmaceuticals LLC d/b/a Par Pharmaceutical (formerly d/b/a Qualitest Pharmaceuticals) bmoore@teamtogut.com, aglaubach@teamtogut.com;dperson@teamtogut.com
Carol A. Slocum	on behalf of Creditor AmerisourceBergen Drug Corporation d/b/a American Health Packaging cslocum@klehr.com lclark@klehr.com
Carol A. Slocum	on behalf of Creditor AmerisourceBergen Drug Corporation cslocum@klehr.com lclark@klehr.com

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Carol A. Slocum	on behalf of Creditor Cencora Global Procurement Ltd cslocum@klehr.com lclark@klehr.com
Christopher R. Donoho, III	on behalf of Creditor Mylan Pharmaceuticals Inc. chris.donoho@hoganlovells.com
Christopher R. Donoho, III	on behalf of Creditor Mylan Ireland Ltd. chris.donoho@hoganlovells.com
Colleen Restel	on behalf of Interested Party PAI Holdings LLC D/B/A PAI Pharma crestel@lowenstein.com
Daniel H. Slate	on behalf of Creditor McKesson Corporation and certain corporate affiliates dslate@buchalter.com
Daniel M Pereira	on behalf of Creditor Citizens Bank National Association dpereira@stradley.com
David E. Sklar	on behalf of Creditor PSL Consulting LLC dsklar@pashmanstein.com lsalcedo@pashmanstein.com;gkarnick@pashmanstein.com
Dwight Yellen	on behalf of Creditor Waterford Bnak N.A. dwight@clglex.com
Eugene D. Roth	on behalf of Interested Party Nirmal Mulye erothesq@gmail.com
Eugene D. Roth	on behalf of Interested Party Nostrum Pharmaceuticals LLC erothesq@gmail.com
Fran B. Steele	on behalf of U.S. Trustee U.S. Trustee Fran.B.Steele@usdoj.gov
Fred Weinstein	on behalf of Creditor Altro Pharmaceuticals Inc fweinstein@kelaw.com, bbieber@kelaw.com;jpeters@kelaw.com
Geoffrey P. Neumann	on behalf of Debtor Nostrum Laboratories Inc. geoff.neumann@gmail.com, timothy.neumann25@gmail.com;btassillo@aol.com;esq.geoffrey pn.b127774@notify.bestcase.com
Holly Smith Miller	on behalf of Creditor Humana Pharmacy Inc. hsmiller@gsbblaw.com
Holly Smith Miller	on behalf of Creditor Enclara Pharmacia Inc. hsmiller@gsbblaw.com
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Joseph Casello	on behalf of Interested Party Jas Diamonds Inc. jcasello@cvclaw.net, jcasello627@gmail.com
Joseph H. Lemkin	on behalf of Creditor TAK Properties LLC jlemkin@stark-stark.com
Joseph M. Garemore	on behalf of Creditor Banc of America Leasing & Capital LLC jgaremore@brownconnery.com
Julie M. Murphy	on behalf of Creditor Citizens Bank National Association jmmurphy@stradley.com
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Kevin Bradford	on behalf of Creditor Pennsylvania Department of Human Services kbradford@attorneygeneral.gov crmomjian@attorneygeneral.gov
Kyle Francis Eingorn	on behalf of Creditor Lamborghini Financial Services keingorn@dbblegal.com
Lauren Sisson	on behalf of Interested Party Strides Pharma Inc. lauren.sisson@haynesboone.com
Leah Victoria Lerman	on behalf of Creditor United States of America leah.v.lerman@usdoj.gov
Michael Kwiatkowski	on behalf of Creditor Symmetry Energy Solutions LLC mkwiatkowski@cullenllp.com, crodriguez@cullenllp.com

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on behalf of Interested Party ANI Pharmaceuticals mtrentin@orrick.com ssallie@coleschotz.com;dcarnie@orrick.com

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on behalf of Creditor McKesson Corporation and certain corporate affiliates mdudas@msbnj.com

Morton R. Branzburg

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Robert M. Schechter

on behalf of Creditor Committee The Official Committee of Unsecured Creditors rmschechter@pbnlaw.com
mpdermatis@pbnlaw.com;pnbalala@pbnlaw.com;jmoconnor@pbnlaw.com;kmdunn@pbnlaw.com

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Timothy P. Neumann

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btassillo@aol.com;geoff.neumann@bnfsbankruptcy.com;geoff.neumann@gmail.com;neumann.timothyb127774@notify.bestcase.
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U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 45