IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: INSYS THERAPEUTICS, INC., *et al.*, Liquidating Debtors.[1]	Chapter 11 Case No. 19-11292 (BLS) (Jointly Administered) **Hearing Date:** **December 17, 2025 at 9:15 a.m. (ET)** **Objection Deadline:** **December 10, 2025 at 4:00 p.m. (ET)**

MOTION OF THE TRUSTEE OF THE
INSYS LIQUIDATION TRUST FOR ENTRY OF AN ORDER
FURTHER EXTENDING THE TIME TO OBJECT TO ALL CLAIMS

William Henrich, in his capacity as liquidating trustee (the "Trustee") of the Insys Liquidation Trust (the "Trust"), as successor in interest to the above-captioned debtors and debtors in possession (collectively, the "Debtors"), hereby moves this Court (the "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), pursuant to sections 105(a) of 11 U.S.C. §§ 101-1532 (as amended and applicable herein, the "Bankruptcy Code") and Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), extending the Claims Objection Deadline (defined below) through and including January 29, 2027. In support of the Motion, the Trustee respectfully represents as follows:

[1] The Liquidating Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

BACKGROUND

1. On June 10, 2019 (the "Petition Date"), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (the "Chapter 11 Cases").

2. On June 20, 2019, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an official committee of unsecured creditors in these Chapter 11 Cases (the "Committee"). No trustee or examiner has been appointed in these Chapter 11 Cases.

3. On January 16, 2020, this Court entered an order [Docket No. 1115] (the "Confirmation Order") confirming the *Second Amended Joint Chapter 11 Plan of Liquidation of Insys Therapeutics, Inc. and Its Affiliated Debtors* (the "Plan") in the Chapter 11 Cases.

4. On February 18, 2020 (the "Effective Date"), the Plan became effective in accordance with its terms and, in accordance with the Plan, Confirmation Order and that certain *Trust Agreement for Insys Liquidation Trust* (the "Trust Agreement"), certain assets[2] of the Debtors existing as of such date were transferred to and became vested in the Trust, and William Henrich was appointed the Trustee of the Trust.

5. In accordance with the Plan and the Trust Agreement, from and after the Effective Date, objections to various claims[3] may be prosecuted by the Trustee. *See e.g.*, Section 7.1 of the Plan.

6. Pursuant to the Confirmation Order and the Plan, the deadline to object to claims (other than Administrative Claims) (the "Non-Administrative Claims") is one-hundred eighty

[2] These assets include all assets of the Debtors other than (i) the VRT Operating Reserve, (ii) the Products Liability Insurance Rights, and (iii) any Interests held by Liquidating Debtors in other Liquidating Debtors, as defined in the Plan.

[3] Other than Personal Injury Claims (as defined in the Plan).

(180) days following the later of the (a) Effective Date and (b) the date that a proof of claim is filed or amended or on such later date as fixed by this Court (the "Non-Administrative Claims Objection Deadline"). *See* Section 7.1 of the Plan. Upon motion, an order was entered extending the Non-Administrative Claims Objection Deadline to February 16, 2021 [Docket No. 1353]. Upon further order, the Non-Administrative Claims Objection Deadline was further extended to August 31, 2021 [Docket No. 1468]. Upon further order, the Non-Administrative Claims Objection Deadline was extended along with the Administrative Claims Objection Deadline (defined below) to January 28, 2022 [Docket No. 1661]. Upon further orders, the deadline to object to all claims was extended to January 31, 2024 [Docket 1883] and then January 31, 2025 [Docket 1957]. Upon the most recent order, the deadline to object to all claims was extended to January 30, 2026 [Docket 2011] (collectively, the "Claims Objection Deadline").

7. To date, the Trustee has filed twenty-four (24) omnibus claims objections (the "Claims Objections") and has expunged, re-classified, and/or reduced almost one thousand (1,000) claims. [Docket Nos., 1396, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1674, 1670, 1704, 1715, 1716, 1749, 1750, 1788, 1789, 1813, 1814, 1844, 1845, 2030 and 2059]. In addition to filing claims objections, the Trustee has resolved many claims informally, resulting in a reduction of hundreds of thousands of dollars in administrative claims, and millions in general unsecured claims. The Trustee has completely resolved the Class 3 Convenience Class and has made distributions to these creditors in August of 2023 and has largely resolved the Class 4 Trade Class Claims, Administrative, and Priority Claims.

8. The Trustee has also resolved multiple actions against former insiders of the Debtors during the past year, as well as significant litigation against the purchaser of Debtors' pharmaceutical assets.

9. There are many additional claims in the myriad of other classes that the Trustee continues to work to resolve before it can determine if additional claim objections need to be filed.

10. Finally, in accordance with the Plan and Plan Supplements, the Trustee needs to oversee and/or develop certain claim protocols in various claim classes in order to allow for distributions. As part of that process, the Trustee may identify additional objections that need to be filed.

11. As throughout these Cases, the Trustee and his professionals continue to be involved in active discussions with claimants in an effort to try to resolve additional claims.

12. The Trust continues to prosecute adversary proceedings that it commenced under §§§547(b), 548 and 550 of the Bankruptcy Code (the "Adversary Proceedings"). The Trustee is also working on numerous other tasks he is charged with by the Trust. Given the foregoing, the volume of work the Trustee and his professionals are undertaking to work through many claims in this case as well as other tasks they are charged with, and the reasons set forth below, the Trustee seeks to extend the Claims Objection Deadline for an additional year to January 29, 2027.

JURISDICTION AND VENUE

13. The Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334 and Sections VII and II of the Plan. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

14. The statutory predicate for the relief requested herein is Bankruptcy Code sections 105(a) and 502. Such relief is also warranted under Bankruptcy Rules 3007 and 9006 and Local Rule 9006-2.

15. The Trustee consents pursuant to Local Rule 9013-1(f) to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court,

absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

RELIEF REQUESTED

16. By this Motion, the Trustee seeks entry of an order, substantially in the form attached hereto, pursuant to sections 102 and 105 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9006 and Local Rule 9006-2, extending the Claims Objection Deadline through and including January 31, 2025.

17. To date, over four thousand (4,000) proofs of claim aggregating approximately at least $10,800,000,000[4] have been filed. Since the Effective Date, the Trustee and his professionals have been diligently reconciling and reviewing claims across multiple class of claimants, and have been in continuous discussions with claimants in an effort to consensually resolve such claims. Hundreds of other claims have been resolved or expunged through the Claims Objections and directly with claimants and Trustee anticipates additional objections to be filed.

18. To date, the Trustee has reduced the number of asserted Administrative and Priority Claims by more than ninety-five (95) percent through settlement and the Claims Objections. Since the last extension, the Trustee and his professionals have continued those efforts and have further reduced the pool of administrative, priority and general unsecured claims.

19. Additionally, the Trustee and his professionals have continued to evaluate the claims filed in other classes established under the Plan and undertaking certain Trustee obligations with respect to those classes. For example, the Trustee engaged in notice and data collection procedures required by the Class Claims Procedures and Class Representatives for Third Party

[4] Upon information and belief, these figures do not include Personal Injury Claims and are subject to many unliquidated and contingent claims.

Payor Class Claims [First Plan Supplement, Ex. O; Docket No. 1049], then undertook to review such data, and ultimately filed objections against certain third party payor claimants, which narrowed the third party payor claims pool [Docket No. 2059]. The Trustee and his professional have also continued to engage with class representatives for other classes concerning anticipated noticing, claims procedures, and allocation protocols for those classes. The Trustee expects that there will be substantial additional work to be done with respect to many of the classes.

20. In addition to the work that the Trustee and his professionals are doing for the Trust, they are also actively monitoring the ongoing opioid bankruptcy cases -- including Purdue Pharmaceuticals and Mallinckrodt Pharmaceuticals – because certain of the procedures in this case are dependent, in whole or in part, on resolution of issues in those cases. Most notably, the SMT Allocation Protocol in the Confirmation Order requires that an allocation protocol be developed for the SMT class in a manner substantially consistent with any global allocation protocol developed in the national opioid litigation or within other bankruptcy cases of opioid defendants that allocates distributions or recoveries among governmental entities on a nationwide base.

21. Due to the complexity of the claims and distribution processes in this case, the Trustee and his professionals have spent an extensive amount of time setting up and working on multiple tracks to review and reconcile certain classes of claims. As set forth under the Plan and related supplements, such processes require a comprehensive review of claims. The Trustee and his professionals have been and will continue to diligently and efficiently working through these processes. However, some of these processes require the work of parties other than the Trustee (e.g., the representatives for the various claims classes) that has continued to make the Trustee's and counsel's efforts more time consuming.

22. In addition to the claims review process, the Trustee and his professionals have been working to liquidate and recover assets, including prosecuting the Adversary Proceedings, numerous other actions against former Insys professionals, insurance providers and Insys personnel, as well as recovering thereof, and evaluating other potential causes of action, liquidating assets, addressing lawsuits that continue to be filed across the country, responding to creditor inquiries, responding to subpoenas, and attending to Trust administration, among other things.

23. Given the competing demands and the various claims processes mentioned above, in these cases, the Trustee believes he will require more time than he currently has in order to review, conduct due diligence and object, if necessary, to all Claims. Given the complexity of the Plan and claims filed, the Trustee will require more time to review, analyze and if necessary, object to the Claims.

APPLICABLE AUTHORITY

24. Bankruptcy Rule 9006(b) provides that the Court may extend a time period provided under the Bankruptcy Rules or order of the Court, except for time periods provided under certain Bankruptcy Rules that are not applicable here. *See* Fed. R. Bankr. P. 9006(b).

25. Bankruptcy Code section 105(a) provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). In addition, it is generally recognized that "[s]ection 105(a) authorizes the bankruptcy court, or the district court sitting in bankruptcy, to fashion such orders as are required to further the substantive provisions of the Code." *See In re Morristown & E. R. Co.,* 885 F.2d 98, 100 (3d Cir. 1989) (citing COLLIER ON BANKRUPTCY, ¶ 105.04 at 105-15 & n. 5 (15th rev. ed. 1989)). Moreover, the Confirmation Order provides that the Claims Objection Deadline may be extended to a date as designated in a final order of this Court.

26. In this instance, sufficient cause exists to extend further the Claims Objection Deadline. The requested extension of time will provide the Trustee the opportunity to continue its claims review and analysis, object to Claims that are factually and legally unsupportable, and attempt to negotiate the resolution of such objections.

NOTICE

27. Notice of this Motion has been given to the Office of the United States Trustee and any other party entitled to notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Trustee submits that no further notice is required.

CONCLUSION

WHEREFORE, the Trustee respectfully requests that the Court enter the Proposed Order extending the Claims Objection Deadline through and including January 29, 2027 and granting the Trustee such other and further the relief as is just and proper.

(Signature page follows)

Dated: November 26, 2025

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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Counsel to the Trustee of the Insys Liquidation Trust

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: INSYS THERAPEUTICS, INC., *et al.*, Liquidating Debtors.[1]	Chapter 11 Case No. 19-11292 (BLS) (Jointly Administered) **Hearing Date:** **December 17, 2025, at 9:15 a.m. (ET)** **Objection Deadline:** **December 10, 2025, at 4:00 p.m. (ET)**

NOTICE OF MOTION OF THE TRUSTEE OF THE
INSYS LIQUIDATION TRUST FOR ENTRY OF AN ORDER
FURTHER EXTENDING THE TIME TO OBJECT TO ALL CLAIMS

PLEASE TAKE NOTICE that today, William Henrich, in his capacity as liquidating trustee (the "Trustee") of the Insys Liquidation Trust (the "Trust") filed the *Motion of the Trustee of the Insys Liquidation Trust for Entry of an Order Further Extending the Time to Object to All Claims* (the "Motion").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be (a) in writing and served on or before **December 10, 2025, at 4:00 p.m. (ET)** (the "Objection Deadline"); (b) filed with the Clerk of the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801; and (c) served so as to be received on or before the Objection Deadline by the undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON **DECEMBER 17, 2025, AT 9:15 A.M. (ET)** BEFORE THE HONORABLE BRENDAN L. SHANNON OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE.

[1] The Liquidating Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: November 26, 2025

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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Counsel to the Trustee of the Insys Liquidation Trust

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
INSYS THERAPEUTICS, INC., *et al.*,	Case No. 19-11292 (BLS)
Liquidating Debtors.[1]	(Jointly Administered)
	Re: _____

ORDER GRANTING MOTION OF THE LIQUIDATING TRUSTEE OF THE INSYS TRUST FOR ENTRY OF AN ORDER FURTHER EXTENDING THE TIME TO OBJECT TO ALL CLAIMS

Upon the motion (the "Motion")[2] of the William Henrich, in his capacity as liquidating trustee (the "Trustee") of the Insys Trust (the "Trust"), as successor in interest to the above captioned debtors and debtors in possession (collectively, the "Debtors"), for entry of an order, pursuant to sections 105 and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq*., Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure, and Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, extending the time to object to all Claims filed in the Chapter 11 Cases, all as more fully set forth in the Motion; and it appearing that the Court has jurisdiction over this matter; and it appearing that the notice of the Motion as set forth therein is sufficient, and that no other or further notice need be provided; and it further appearing that the relief requested in the Motion is in the best interests of the Trust, its beneficiaries and all other parties-in-interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

[1] The Liquidating Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Insys Therapeutics, Inc. (7886); IC Operations, LLC (9659), Insys Development Company, Inc. (3020); Insys Manufacturing, LLC (0789); Insys Pharma, Inc. (9410); IPSC, LLC (6577); and IPT 355, LLC (0155).

[2] Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

1. The Motion is GRANTED as set forth herein.

2. The Claims Objection Deadline is hereby extended through and including January 29, 2027.

3. Entry of this Order is without prejudice to the rights of the Trust to seek further extensions of the Claims Objection Deadline.