

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

In re:

MALLINCKRODT PLC,

Reorganized Debtor.¹

OPIOID MASTER DISBURSEMENT TRUST II,

Plaintiff,

VS.

ARGOS CAPITAL APPRECIATION MASTER
FUND LP, *et al.*,

Defendants.

Chapter 11

Case No. 20-12522 (JTD)

Adv. Pro. No.
22-50435 (JTD)

Re: Adv. D.I. Nos. 460; 461

AMENDED NOTICE OF APPEAL OF OPIOID MASTER DISBURSEMENT TRUST II

The Opioid Master Disbursement Trust II (“**Trust**”) hereby amends the *Notice of Appeal of Opioid Master Disbursement Trust II* [Adv. D.I. 468], and hereby appeals pursuant to 28 U.S.C. § 158(a)(1), Federal Rule of Bankruptcy Procedure 8003, and Local Rule of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware 8003-1, the *Memorandum Opinion and Order* (“**Opinion**”) [Adv. D.I. 460] and *Judgment* [Adv. D.I. 461] entered on September 5, 2024, and the *Revised and Restated Judgment* (“**Revised Judgment**”) [Adv. D.I. 513] entered on January 13, 2025, in the above-referenced adversary proceeding.

1 The Reorganized Debtor in this chapter 11 case is Mallinckrodt plc. On May 3, 2023, the Court closed the chapter 11 cases of the Reorganized Debtor's debtor-affiliates (collectively, "**Debtors**"). A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtor's claims and noticing agent at <http://restructuring.ra.kroll.com/Mallinckrodt>. The Reorganized Debtor's mailing address is 675 McDonnell Blvd., Hazelwood, Missouri 63042.

The Opinion, Judgment, and Revised Judgment granted the relief requested in the following four motions:

(1) *Motion to Dismiss the Amended Complaint as to Defendants Citadel Securities LLC and Susquehanna Securities, LLC Pursuant to the Protocol Order Relating to Conduits, Non-Transferees, “Stockbrokers,” “Financial Institutions,” “Financial Participants,” and Dissolved Entities (“Citadel/Susquehanna Motion”)* [Adv. D.I. 215] filed on December 8, 2023, by Citadel Securities LLC and Susquehanna Securities, LLC;

(2) *Motion to Dismiss the Amended Complaint as to Defendants T. Rowe Price Associates, Inc. and Various T. Rowe Price Funds Pursuant to the Protocol Order Relating to Conduits, Non-Transferees, “Stockbrokers,” “Financial Institutions,” “Financial Participants,” and Dissolved Entities (“TRP Motion”)* [Adv. D.I. 217] filed on December 8, 2023, by T. Rowe Price Associates, Inc. and the T. Rowe Price Funds²;

(3) *Motion to Dismiss the Amended Complaint as to Defendants Rock Creek MB, LLC, RIEF Trading LLC, GF Trading LLC, and RIEF RMP LLC Pursuant to the Protocol Order Relating to Conduits, Non-Transferees, “Stockbrokers,” “Financial Institutions,” “Financial Participants,” and Dissolved Entities (“Renaissance Motion”)* [Adv. D.I. 242] filed on January 10, 2024, by Rock Creek MB, LLC, GF Trading LLC, RIEF Trading LLC, and RIEF RMP LLC; and

² The T. Rowe Price Funds are: T. Rowe Price All-Cap Opportunities Fund, Inc.; T. Rowe Balanced Fund, Inc.; T. Rowe Price All-Cap Opportunities Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Health Sciences Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Equity Index 500 Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Moderate Allocation Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Global Allocation Fund, Inc.; T. Rowe Price Health Sciences Fund, Inc.; T. Rowe Price Spectrum Conservative Allocation Fund, a Series of T. Rowe Price Spectrum Funds II, Inc.; T. Rowe Price Spectrum Moderate Allocation Fund, a Series of T. Rowe Price Spectrum Funds II, Inc.; T. Rowe Price Spectrum Moderate Growth Allocation Fund, a Series of T. Rowe Price Spectrum Funds II, Inc.; and T. Rowe Price Value Fund, Inc.

(4) *Motion to Dismiss the Amended Complaint as to Defendants Tower Research Capital LLC, Spire X Trading LLC, and LaTour Trading LLC Pursuant to the Protocol Order Relating to Conduits, Non-Transferees, “Stockbrokers,” “Financial Institutions,” “Financial Participants,” and Dissolved Entities (“Tower Motion”)* [Adv. D.I. 286] filed on January 29, 2024, by Tower Research Capital LLC, Spire X Trading LLC, and LaTour Trading LLC.

The Opinion, Judgment, and Revised Judgment denied the oppositions filed by the Trust to the Citadel/Susquehanna Motion on January 19, 2024 [Adv. D.I. 263]; the TRP Motion on January 19, 2024 [Adv. D.I. 264]; the Renaissance Motion on February 5, 2024 [Adv. D.I. 314]; and the Tower Motion on February 19, 2024 [Adv. D.I. 344].

The names of all parties to the Opinion, Judgment, and Revised Judgment appealed from, and the names, addresses, and telephone numbers of their respective attorneys, are as follows:

Party	Name and Address of Counsel
Opioid Master Disbursement Trust II	COLE SCHOTZ P.C. Justin R. Alberto Patrick J. Reilley 500 Delaware Avenue, Suite 1410 Wilmington, DE 19801 Telephone: (302) 652-3131 Facsimile: (302) 652-3117 jalberto@coleschotz.com preilley@coleschotz.com Anthony De Leo, Esq. 1325 Avenue of the Americas 19th Floor New York, NY 10019 Telephone: (212) 752-8000 Facsimile: (212) 752-8393 adeleo@coleschotz.com -and- CAPLIN & DRYSDALE, CHARTERED Kevin C. Maclay Todd E. Phillips Jeffrey A. Liesemer Serafina Concannon 1200 New Hampshire Avenue NW, 8th Floor Washington, D.C. 20036 Telephone: (202) 862-5000 Facsimile: (202) 429-3301 kmaclay@capdale.com tphillips@capdale.com jliesemer@capdale.com sconcannon@capdale.com
Citadel Securities LLC	POTTER ANDERSON CORROON LLP Jeremy W. Ryan Andrew L. Brown 1313 N. Market Street, 6th Floor Wilmington, DE 19801 Telephone: (302) 984-6000 jryan@potteranderson.com abrown@potteranderson.com -and-

Party	Name and Address of Counsel
	WILMER CUTLER PICKERING HALE AND DORR LLP Phillip D. Anker Noah A. Levine Ross E. Firsenbaum Michael McGuinness Austin M. Chavez 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8000 philip.anker@wilmerhale.com noah.levine@wilmerhale.com ross.firsenbaum@wilmerhale.com mike.mcguinness@wilmerhale.com austin.chavez@wilmerhale.com
Susquehanna Securities, LLC	POTTER ANDERSON CORROON LLP Jeremy W. Ryan Andrew L. Brown 1313 N. Market Street, 6th Floor Wilmington, DE 19801 Telephone: (302) 984-6000 jryan@potteranderson.com abrown@potteranderson.com -and- WILMER CUTLER PICKERING HALE AND DORR LLP Phillip D. Anker Noah A. Levine Ross E. Firsenbaum Michael McGuinness Austin M. Chavez 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8000 philip.anker@wilmerhale.com noah.levine@wilmerhale.com ross.firsenbaum@wilmerhale.com mike.mcguinness@wilmerhale.com austin.chavez@wilmerhale.com

Party	Name and Address of Counsel
T. Rowe Price Associates, Inc.; T. Rowe Price All-Cap Opportunities Fund, Inc.; T. Rowe Balanced Fund, Inc.; T. Rowe Price All-Cap Opportunities Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Health Sciences Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Equity Index 500 Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Moderate Allocation Portfolio, a Series of T. Rowe Price Equity Series, Inc.; T. Rowe Price Global Allocation Fund, Inc.; T. Rowe Price Health Sciences Fund, Inc.; T. Rowe Price Spectrum Conservative Allocation Fund, a Series of T. Rowe Price Spectrum Funds II, Inc.; T. Rowe Price Spectrum Moderate Allocation Fund, a Series of T. Rowe Price Spectrum Funds II, Inc.; T. Rowe Price Spectrum Moderate Growth Allocation Fund, a Series of T. Rowe Price Spectrum Funds II, Inc.; and T. Rowe Price Value Fund, Inc.	POTTER ANDERSON CORROON LLP Jeremy W. Ryan Andrew L. Brown 1313 N. Market Street, 6th Floor Wilmington, DE 19801 Telephone: (302) 984-6000 jryan@potteranderson.com abrown@potteranderson.com -and- WILMER CUTLER PICKERING HALE AND DORR LLP Phillip D. Anker Noah A. Levine Ross E. Firszenbaum Michael McGuinness Austin M. Chavez 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8000 philip.anker@wilmerhale.com noah.levine@wilmerhale.com ross.firszenbaum@wilmerhale.com mike.mcguinness@wilmerhale.com austin.chavez@wilmerhale.com
Rock Creek MB, LLC; GF Trading LLC; RIEF Trading LLC; and RIEF RMP LLC	POTTER ANDERSON CORROON LLP Jeremy W. Ryan Andrew L. Brown 1313 N. Market Street, 6th Floor Wilmington, DE 19801 Telephone: (302) 984-6000 jryan@potteranderson.com abrown@potteranderson.com -and- WILMER CUTLER PICKERING HALE AND DORR LLP Phillip D. Anker Noah A. Levine Ross E. Firszenbaum Michael McGuinness

Party	Name and Address of Counsel
	Austin M. Chavez 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8000 philip.anker@wilmerhale.com noah.levine@wilmerhale.com ross.firsenbaum@wilmerhale.com mike.mcguinness@wilmerhale.com austin.chavez@wilmerhale.com
Tower Research Capital LLC; Spire X Trading LLC; and LaTour Trading LLC	POTTER ANDERSON CORROON LLP Jeremy W. Ryan Andrew L. Brown 1313 N. Market Street, 6th Floor Wilmington, DE 19801 Telephone: (302) 984-6000 jryan@potteranderson.com abrown@potteranderson.com -and- WILMER CUTLER PICKERING HALE AND DORR LLP Phillip D. Anker Noah A. Levine Ross E. Firsenbaum Michael McGuinness Austin M. Chavez 7 World Trade Center 250 Greenwich Street New York, NY 10007 Telephone: (212) 230-8000 philip.anker@wilmerhale.com noah.levine@wilmerhale.com ross.firsenbaum@wilmerhale.com mike.mcguinness@wilmerhale.com austin.chavez@wilmerhale.com

Pursuant to Federal Rule of Bankruptcy Procedure 8003(a), a copy of the Opinion is attached hereto as **Exhibit A**; a copy of the Judgment is attached hereto as **Exhibit B**; and a copy of the Revised Judgment is attached hereto as **Exhibit C**.

Dated: January 23, 2025
Wilmington, Delaware

Respectfully submitted,

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)
Patrick J. Reilley (No. 4451)
500 Delaware Avenue, Suite 1410
Wilmington, DE 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
jalberto@coleschotz.com
preilley@coleschotz.com

Anthony De Leo, Esq. (admitted *pro hac vice*)
1325 Avenue of the Americas, 19th Floor
New York, NY 10019
Telephone: (212) 752-8000
Facsimile: (212) 752-8393
adeleo@coleschotz.com

-and-

CAPLIN & DRYSDALE, CHARTERED

Kevin C. Maclay, Esq. (admitted *pro hac vice*)
Todd E. Phillips, Esq. (admitted *pro hac vice*)
Jeffrey A. Liesemer, Esq. (admitted *pro hac vice*)
Serafina Concannon, Esq. (admitted *pro hac vice*)
1200 New Hampshire Avenue NW, 8th Floor
Washington, D.C. 20036
Telephone: (202) 862-5000
Facsimile: (202) 429-3301
kmaclay@capdale.com
tphillips@capdale.com
jliesemer@capdale.com
sconcannon@capdale.com

Counsel to the Opioid Master Disbursement Trust II