



**“Protocol Order”**”), and holding, in relevant part, that the Share Repurchases were “qualifying transactions” for purposes of Section 546(e);

2. WHEREAS, on January 23, 2025, the Trust filed an *Amended Notice of Appeal* [D.I. 518], appealing the Bankruptcy Court Opinion;

3. WHEREAS, the Defendant filed a motion pursuant to the Protocol Order, seeking dismissal of the Trust’s claims against it, *see* D.I. 600;

4. WHEREAS, after the Bankruptcy Court Opinion, the Court granted the Defendant’s motion and entered a non-final judgment in favor of the Defendant and against the Trust, *see* D.I. 608 (the **“Non-Final Judgment”**);

5. WHEREAS, on November 24, 2025, the District Court issued a *Memorandum Opinion and Order* [D.I. 652] (the **“District Court Opinion”**), which affirmed the Bankruptcy Court Opinion;

6. WHEREAS, the Trust did not file a notice of appeal of the District Court Opinion by the deadline to do so under the Federal Rules of Appellate Procedure (the **“Appeal Deadline”**);

7. WHEREAS, since the passage of the Appeal Deadline, and in light of the Trust’s decision not to seek further appeal of the District Court Opinion, the Parties have conferred and agree that there is no just reason for delay in converting the Non-Final Judgment to a partial final judgment;

NOW, THEREFORE, IT IS STIPULATED AND AGREED:

1. The Non-Final Judgment should be converted from a non-final judgment to a partial final judgment pursuant to Federal Rule of Civil Procedure 54(b), made applicable to the above-captioned adversary proceeding by Federal Rule of Bankruptcy Procedure 7054(a).
2. The partial final judgment finally resolves all claims against the Defendant, and final judgment should be entered in favor of the Defendant and against the Plaintiff.
3. The Parties respectfully request that the Court enter the proposed order approving this Stipulation, attached hereto as Exhibit A.

Dated: February 3, 2026

By: /s/ Justin R. Alberto

Justin R. Alberto (No. 5126)  
Patrick J. Reilley (No. 4451)  
**COLE SCHOTZ P.C.**  
500 Delaware Avenue, Suite 600  
Wilmington, Delaware 19801  
Tel: (302) 652-3131  
Fax: (302) 652-3117  
Jalberto@coleschotz.com  
Preilley@coleschotz.com

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

-and-

**CAPLIN & DRYSDALE, CHARTERED**

Kevin C. Maclay (*admitted pro hac vice*)  
Todd E. Phillips (*admitted pro hac vice*)  
Jeffrey A. Liesemer (*admitted pro hac vice*)  
Serafina Concannon (*admitted pro hac vice*)  
1200 New Hampshire Avenue NW, 8th Fl.  
Washington, D.C. 20036  
Tel: (202) 862-5000  
Fax: (202) 429-3301

By: /s/ Jody C. Barillare

Jody C. Barillare, Esq. (#5107)  
**MORGAN, LEWIS & BOCKIUS LLP**  
1201 N. Market Street, Suite 2201  
Wilmington, Delaware 19801  
Telephone: (302) 574-3000  
Facsimile: (302) 574-3001  
Email: [jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)

- and -

John C. Goodchild, III, Esq. (*pro hac vice*)  
Joshua Dorchak, Esq. (*pro hac vice*)  
Melissa Y. Boey, Esq. (*pro hac vice*)  
**MORGAN, LEWIS & BOCKIUS LLP**  
101 Park Avenue  
New York, New York 10178  
Telephone: (212) 309-6000  
Facsimile: (212) 309-6001  
Emails: [john.goodchild@morganlewis.com](mailto:john.goodchild@morganlewis.com);  
[joshua.dorchak@morganlewis.com](mailto:joshua.dorchak@morganlewis.com);  
[melissa.boey@morganlewis.com](mailto:melissa.boey@morganlewis.com)

*Counsel to Defendant Deutsche Bank AG*

kmaclay@capdale.com  
tphillips@capdale.com  
jliesemer@capdale.com  
sconcannon@capdale.com

*Counsel to the Opioid Master Disbursement  
Trust II*

**Exhibit A**

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

	:	
In re:	:	Chapter 11
	:	
MALLINCKRODT PLC,	:	Case No. 20-12522 (BLS)
	:	
Reorganized Debtor. <sup>1</sup>	:	
	:	
OPIOID MASTER DISBURSEMENT TRUST II,	:	
	:	Adversary Proceeding
Plaintiff,	:	
	:	No. 22-50435 (BLS)
v.	:	
	:	
ARGOS CAPITAL APPRECIATION MASTER	:	
FUND LP, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**ORDER ON STIPULATION CONVERTING  
NON-FINAL JUDGMENT TO FINAL JUDGMENT  
IN FAVOR OF DEUTSCHE BANK AG**

Pursuant to the *Stipulation Converting Non-Final Judgment to Final Judgment in favor of Deutsche Bank AG* (the “Stipulation”) that was entered into by and between plaintiff, the Opioid Master Disbursement Trust II (“Plaintiff”), on the one hand, and defendant Deutsche Bank AG (“Defendant”), on the other hand,<sup>2</sup> IT IS SO ORDERED:

<sup>1</sup> The Reorganized Debtor in this chapter 11 case is Mallinckrodt plc (“Mallinckrodt”). On May 3, 2023, the Court entered an order closing the chapter 11 cases of the Reorganized Debtor’s debtor-affiliates (together with Mallinckrodt, “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.

<sup>2</sup> Capitalized terms not defined herein shall have the same meanings ascribed to them in the Stipulation, which was filed on February 3, 2026.

1. Pursuant to Federal Rule of Civil Procedure 54(b), made applicable to the above-captioned adversary proceeding by Federal Rule of Bankruptcy Procedure 7054(a), and under the facts set forth in the Stipulation, there is no just reason for delay in converting the Non-Final Judgment from a non-final judgment to a partial final judgment.

2. Accordingly, the Non-Final Judgment is converted from a non-final judgment to a partial final judgment pursuant to Federal Rule of Civil Procedure 54(b).

3. The partial final judgment finally resolves all claims against the Defendant, and final judgment is entered in favor of the Defendant and against the Plaintiff, without further action by the Court.