

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

In re: MALLINCKRODT PLC.,	§	
	§	Chapter 11
	§	
Reorganized Debtor.	§	Case No. 20-12522 (BLS)
	§	

**STIPULATION OF THE OPIOID MASTER DISBURSEMENT TRUST II TRUSTEES
AND CERTAIN DISTRIBUTOR CLAIMANTS**

The Opioid Master Disbursement Trust II Trustees, on behalf of the Opioid Master Disbursement Trust II (“Opioid MDT II”), and the distributor claimants listed in Appendix A hereto (collectively, the “Distributor Claimants”) hereby agree and stipulate as follows:

1. On October 12, 2020 (the “Petition Date”), Mallinckrodt PLC and certain of its affiliates, as debtors and debtors in possession (collectively, “Mallinckrodt” or the “Debtors”) filed voluntary petitions for relief under Chapter 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware. The cases are being jointly administered under Chapter 11 Case No. 20-12522.

2. On March 2, 2022, the Court entered an Order (as revised, the “Confirmation Order”) confirming the Fourth Amended Joint Plan of Reorganization (with Technical Modifications) of Mallinckrodt PLC and Its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code the “Plan”).

3. The Confirmation Order states in relevant part that:

the Opioid MDT II Administrator may establish a bar date for all Other Opioid Claims, which will be the date that is 60 days after the service of a notice to be filed with the Bankruptcy Court by the Opioid MDT II Administrator, in accordance with Article IV.Y of the Plan, stating that all Other Opioid Claimants must submit to the Opioid MDT II Administrator a proof of claim form (in a form substantially similar to Official Bankruptcy Form No. 410) within 60 days of the service of such notice.

4. On September 16, 2022, the Opioid MDT II Trustees published a Notice establishing November 18, 2022 at 5:00 p.m. (Prevailing Eastern Time) as the deadline for filing proofs of Class 9(H) Other Opioid Claims (the “Other Opioid Claims Bar Date”).

5. In November 2022, the Distributor Claimants filed the proofs of claim listed in Appendices B-D (collectively, the “Proofs of Claim”). Henry Schein’s relevant proofs of claim are listed in Appendix B, ABDC’s in Appendix C, and Cardinal Health’s in Appendix D. Certain of the Distributor Claimants had previously filed other proofs of claim in earlier stages of the bankruptcy proceedings, but only those proofs of claim listed in Appendices B-D are relevant here and encompassed by this Stipulation.

6. The Opioid MDT II Trustees thereafter sent each Distributor Claimant and/or their counsel a letter expressing a belief that their Proofs of Claim appeared to assert claims released under the Plan. Counsel for the Distributor Claimants and the Opioid MDT II have since conferred on the matter.

7. The Distributor Claimants filed their Proofs of Claim to protect and preserve, and avoid waiving, any additional insured rights under insurance policies purchased by the Debtors. The Distributor Claimants filed the Proofs of Claims given language in the Plan that the Opioid MDT II Trustees agree and stipulate could be reasonably interpreted as suggesting proofs of claim were required to preserve additional insured rights.

8. The Distributor Claimants’ Proofs of Claim were intended to be limited to any additional insured rights under insurance policies purchased by the Debtors, while also making clear that they have Co-Defendant Defensive Rights that are fully preserved.

9. The parties acknowledge, agree, and stipulate that the Distributor Claimants’ Proofs of Claims were/are limited in all instances and respects, and shall be treated as limited in all instances and respects, to any additional insured rights under insurance policies purchased by the Debtors (it is acknowledged that the direct rights of Distributor Claimants under insurance policies

purchased by the Debtors, if any, were not property of the Debtors and therefore were not transferred to the Opioid MDT II) and Co-Defendant Defensive Rights.

10. The parties further acknowledge, agree, and stipulate that the Distributor Claimants' Proofs of Claims: (i) do not encompass any claims for affirmative relief against property of the Debtors; and (ii) do not assert any claims released under the Plan or Confirmation Order.

11. The parties further acknowledge, agree, and stipulate that nothing in this Stipulation shall be understood to waive or modify in any way the Distributor Claimants' Co-Defendant Defensive Rights or any additional insured rights under insurance policies purchased by the Debtors.

12. The parties further acknowledge, agree, and stipulate that this Stipulation resolves the Distributor Claimants' Proofs of Claim listed in Appendices B-D.

Dated: March 12, 2025
Wilmington, Delaware

Respectfully Submitted,

COLE SCHOTZ P.C.

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APPENDIX A
Distributor Claimant Parties

Henry Schein Claimants (collectively, “Henry Schein”)

Henry Schein, Inc.
Henry Schein Medical Systems, Inc.
Insource, Inc.
General Injectables & Vaccines, Inc.

ABDC Claimants (collectively, “ABDC”)

AmerisourceBergen Corporation
AmerisourceBergen Drug Corporation

Cardinal Health Claimants (collectively, “Cardinal Health”)

- Cardinal Health, Inc.
- Cardinal Health 3, LLC
- Cardinal Health 3, Inc.¹
- Cardinal Health l04, LP
- Cardinal Health l07, Inc.²
- Cardinal Health l08, LLC (f/k/a Cardinal Health l08, Inc.)
- Cardinal Health ll0, LLC (d/b/a Gen-Source RX) (f/k/a Cardinal Health ll0, Inc.)
- Cardinal Health ll2, LLC
- Cardinal Health ll3, LLC
- Cardinal Health 4ll, Inc.³
- Cardinal Health P.R. l20, Inc. (f/k/a Borschow Hospital & Medical Supplies, Inc.)
- Kinray, LLC (f/k/a Kinray, Inc.)⁴
- Cardinal Health 127, Inc.
- Cardinal Syracuse, Inc., a New York corporation (Syracuse, New York)⁵
- Marmac Distributors, Inc., a Connecticut corporation (Hartford, Connecticut)⁶
- James W. Daly, Inc., a Massachusetts corporation (Peabody, Massachusetts)⁷
- Ohio Valley-Clarksburg, Inc., a Delaware corporation (Wheeling, West Virginia)⁸
- Chapman Drug Company, a Tennessee corporation (Knoxville, Tennessee)⁹

¹ Cardinal Health 3, Inc. merged into Cardinal Health 3, LLC on 7/1/2005.

² Cardinal Health l07, Inc. is known as Cardinal Health l07, LLC.

³ Cardinal Health 4ll, Inc. merged into Cardinal Health ll0, LLC on 1/1/2016.

⁴ Kinray, Inc. merged into Kinray, LLC on 1/1/2014. Thereafter, Kinray, LLC merged into Cardinal Health ll0, LLC on 1/1/2017.

⁵ Cardinal Syracuse, Inc. merged into Cardinal Health ll0, LLC on 9/30/2001.

⁶ Marmac Distributors, Inc. merged into Cardinal Health 200, LLC as of 6/30/2000.

⁷ James W. Daly, Inc. changed its name to Cardinal Health l06, Inc. Cardinal Health l06, Inc. then merged into Cardinal Health l03, Inc. Thereafter, Cardinal Health l03, Inc. merged into Cardinal Health ll0, LLC on 5/31/2005.

⁸ Ohio Valley-Clarksburg, Inc. merged into Cardinal Health ll0, LLC on 9/31/2001.

⁹ Chapman Drug Company Merged into Cardinal Health l03, Inc. on 12/31/1998. Thereafter, Cardinal Health l03,

- Cardinal Florida, Inc., a Florida corporation (Lakeland, Florida)¹⁰.
- Cardinal Mississippi, Inc. a Mississippi corporation (Richland, Mississippi)¹¹
- Solomons Company, a Georgia corporation (Savannah, Georgia)¹²
- Whitmire Distribution Corporation, a Delaware corporation (Folsom, California)¹³
- Humiston-Keeling, Inc., an Illinois corporation (Calumet City, Illinois)¹⁴
- Behrens Inc., a Texas corporation (Waco, Texas)¹⁵
- Parmed Pharmaceuticals, Inc. (f/k/a Parmed Pharmaceuticals, Inc.)¹⁶
- Red Key, Inc., an Ohio corporation
- Red Oak Sourcing, LLC, as agent for Cardinal Health
- Any other subsidiary of Cardinal Health, Inc. (“CHI”), an Ohio corporation, as may be designated by CHI.

Inc. merged into Cardinal Health 110, LLC on 5/31/2005.

10 Cardinal Florida, Inc. merged into Cardinal Health 103, Inc. on 9/30/1998. Thereafter, Cardinal Health 103, Inc. merged into Cardinal Health 110, LLC on 5/31/2005.

11 Cardinal Mississippi, Inc. merged into Cardinal Health 103, Inc. on 9/30/1998. Thereafter, Cardinal Health 103, Inc. merged into Cardinal Health 110, LLC on 5/31/2005.

12 Solomons Company merged into Cardinal Health 103, Inc. on 9/23/1998. Thereafter, Cardinal Health 103, Inc. merged into Cardinal Health 110, LLC on 5/31/2005.

13 Whitmire Distribution Corporation is the former name of Cardinal Health 110, LLC.

14 Humiston-Keeling, Inc. merged into Cardinal Health 110, LLC on 7/1/1994.

15 Behrens Inc. merged into Cardinal Health 110, LLC on 6/30/1998.

16 Parmed Pharmaceuticals, Inc. converted to Parmed Pharmaceuticals, LLC on 1/1/2014. Parmed Pharmaceuticals, LLC merged into Cardinal Health 110, LLC on 1/1/2016.

APPENDIX B***Henry Schein's Subject Proofs of Claim***

ClaimID	Claim Number	Claim Date Filed	Debtor
32876705	189	11/18/2022	Acthar IP Unlimited Company
32876702	188	11/18/2022	IMC Exploration Company
32876706	193	11/18/2022	Infacare Pharmaceutical Corporation
32876715	198	11/18/2022	INO Therapeutics LLC
32876701	192	11/18/2022	Ludlow LLC
32876710	194	11/18/2022	MAK LLC
32876704	190	11/18/2022	Mallinckrodt APAP LLC
32876713	196	11/18/2022	Mallinckrodt ARD Finance LLC
32876714	197	11/18/2022	Mallinckrodt ARD Holdings Inc.
32876712	212	11/18/2022	Mallinckrodt ARD Holdings Limited
32876707	191	11/18/2022	Mallinckrodt ARD IP Unlimited Company
32876716	200	11/18/2022	Mallinckrodt ARD LLC
32876718	201	11/18/2022	Mallinckrodt Brand Pharmaceuticals LLC
32876717	199	11/18/2022	Mallinckrodt Buckingham Unlimited Company
32876719	203	11/18/2022	Mallinckrodt Canada ULC
32876675	180	11/18/2022	Mallinckrodt CB LLC
32876676	179	11/18/2022	Mallinckrodt Critical Care Finance LLC
32876677	178	11/18/2022	Mallinckrodt Enterprises Holdings, Inc.
32876720	204	11/18/2022	Mallinckrodt Enterprises LLC
32876723	205	11/18/2022	Mallinckrodt Enterprises UK Limited
32876721	206	11/18/2022	Mallinckrodt Equinox Finance LLC
32876724	207	11/18/2022	Mallinckrodt Group S.a.r.l.
32876725	208	11/18/2022	Mallinckrodt Holdings GmbH
32876726	209	11/18/2022	Mallinckrodt Hospital Products Inc.
32876727	210	11/18/2022	Mallinckrodt Hospital Products IP Unlimited Company
32876728	211	11/18/2022	Mallinckrodt International Finance SA
32876731	213	11/18/2022	Mallinckrodt International Holdings S.a.r.l.
32876735	214	11/18/2022	Mallinckrodt IP Unlimited Company
32876737	216	11/18/2022	Mallinckrodt LLC
32876738	217	11/18/2022	Mallinckrodt Lux IP S.a.r.l.
32876733	218	11/18/2022	Mallinckrodt Manufacturing LLC
32876734	215	11/18/2022	Mallinckrodt Pharma IP Trading Unlimited Company
32876736	219	11/18/2022	Mallinckrodt Pharmaceuticals Ireland Limited
32876739	223	11/18/2022	Mallinckrodt Pharmaceuticals Limited
32876740	220	11/18/2022	Mallinckrodt plc
32876742	221	11/18/2022	Mallinckrodt Quincy S.a.r.l.
32876746	222	11/18/2022	Mallinckrodt UK Finance LLP
32876747	224	11/18/2022	Mallinckrodt UK Ltd
32876748	225	11/18/2022	Mallinckrodt US Holdings LLC

32876749	226	11/18/2022	Mallinckrodt US Pool LLC
32876846	227	11/18/2022	Mallinckrodt Veterinary, Inc.
32876847	228	11/18/2022	Mallinckrodt Windsor Ireland Finance Unlimited Company
32876849	230	11/18/2022	Mallinckrodt Windsor S.a.r.l.
32876850	231	11/18/2022	MCCH LLC
32876851	233	11/18/2022	MEH, Inc.
32876852	232	11/18/2022	MHP Finance LLC
32876853	229	11/18/2022	MKG Medical UK Ltd
32876678	168	11/18/2022	MNK 2011 LLC
32876680	169	11/18/2022	MUSHI UK Holdings Limited
32876681	170	11/18/2022	Ocera Therapeutics, Inc.
32876682	171	11/18/2022	Petten Holdings Inc.
32876683	172	11/18/2022	SpecGx Holdings LLC
32876684	173	11/18/2022	SpecGx LLC
32876686	174	11/18/2022	ST Operations LLC
32876688	175	11/18/2022	ST Shared Services LLC
32876690	177	11/18/2022	ST US Holdings LLC
32876692	182	11/18/2022	ST US Pool LLC
32876696	183	11/18/2022	Stratatech Corporation
32876697	184	11/18/2022	Sucampo Holdings Inc.
32876698	185	11/18/2022	Sucampo Pharma Americas LLC
32876700	186	11/18/2022	Sucampo Pharmaceuticals, Inc.
32876695	187	11/18/2022	Therakos, Inc.
32876693	181	11/18/2022	Vtesse LLC
32876672	176	11/18/2022	WebsterGx Holdco LLC

APPENDIX C
ABDC's Subject Proofs of Claim

ClaimID	Claim Number	Claim Date Filed	Debtor
32874337	83	11/17/2022	Mallinckrodt Pharmaceuticals Ireland Limited
32874341	84	11/17/2022	Mallinckrodt plc
32874343	85	11/17/2022	SpecGx LLC
32874345	86	11/17/2022	Mallinckrodt LLC
32874347	87	11/17/2022	Mallinckrodt Pharmaceuticals Limited
32874338	88	11/17/2022	Mallinckrodt Pharmaceuticals Ireland Limited
32874350	89	11/17/2022	Mallinckrodt plc
32874353	90	11/17/2022	SpecGx LLC
32874356	91	11/17/2022	Mallinckrodt Pharmaceuticals Limited
32874358	92	11/17/2022	Mallinckrodt LLC

APPENDIX D
Cardinal Health's Subject Proofs of Claim

ClaimID	CLAIM NO.	DEBTOR	CASE NO.
32868722	95	MUSHI UK Holdings Limited	20-12542
32874118	93	Mallinckrodt CB LLC	20-12564
32875343	94	Mallinckrodt LLC	20-12521
32875562	97	Mallinckrodt ARD Holdings Inc.	20-12543
32875563	96	Mallinckrodt plc	20-12522
32875564	99	Mallinckrodt Pharmaceuticals Limited	20-12565
32875565	100	Mallinckrodt Equinox Finance LLC	20-12523
32875566	98	Mallinckrodt International Holdings S.a.r.l.	20-12544
32875568	101	Ocera Therapeutics, Inc.	20-12545
32875569	103	Stratatech Corporation	20-12566
32875570	102	Acthar IP Unlimited Company	20-12524
32875571	104	MCCH LLC	20-12525
32875572	105	Mallinckrodt ARD Holdings Limited	20-12546
32875574	106	Mallinckrodt Critical Care Finance LLC	20-12567
32875575	107	IMC Exploration Company	20-12526
32875576	110	Petten Holdings Inc.	20-12547
32875577	108	Mallinckrodt Enterprises Holdings, Inc.	20-12568
32875578	109	Mallinckrodt Group S.a.r.l.	20-12527
32875579	112	Mallinckrodt Quincy S.a.r.l.	20-12569
32875580	111	Infacare Pharmaceutical Corporation	20-12528
32875581	113	Mallinckrodt IP Unlimited Company	20-12548
32875582	114	MEH, Inc.	20-12529
32875583	115	Sucampo Holdings Inc.	20-12570
32875585	116	Mallinckrodt ARD IP Unlimited Company	20-12549
32875586	117	INO Therapeutics LLC	20-12530
32875587	120	Sucampo Pharma Americas LLC	20-12571
32875588	118	SpecGx Holdings LLC	20-12550
32875589	119	Mallinckrodt Holdings GmbH	20-12531
32875590	121	MHP Finance LLC	20-12532
32875591	123	Mallinckrodt ARD LLC	20-12551
32875592	122	Mallinckrodt Enterprises LLC	20-12572
32875593	125	Mallinckrodt UK Finance LLP	20-12573
32875594	124	Ludlow LLC	20-12533
32875595	126	SpecGx LLC	20-12552
32875596	127	Mallinckrodt Hospital Products Inc.	20-12534
32875597	128	Mallinckrodt Enterprises UK Limited	20-12574
32875600	130	Mallinckrodt Lux IP S.a.r.l.	20-12553
32875601	129	MKG Medical UK Ltd	20-12535

32875602	132	Sucampo Pharmaceuticals, Inc.	20-12575
32875603	131	MAK LLC	20-12536
32875604	133	Mallinckrodt Brand Pharmaceuticals LLC	20-12554
32875605	134	Mallinckrodt APAP LLC	20-12537
32875606	135	Mallinckrodt UK Ltd	20-12576
32875607	136	Mallinckrodt Hospital Products IP Unlimited Company	20-12538
32876368	137	Therakos, Inc.	20-12577
32876366	138	MNK 2011 LLC	20-12539
32876368	139	Mallinckrodt US Holdings LLC	20-12578
32876369	140	Mallinckrodt International Finance SA	20-12540
32875610	141	ST Operations LLC	20-12555
32876512	142	Vtesse LLC	20-12579
32876514	144	Mallinckrodt ARD Finance LLC	20-12541
32876516	145	Mallinckrodt Manufacturing LLC	20-12556
32876518	146	Mallinckrodt US Pool LLC	20-12580
32876519	157	ST Shared Services LLC	20-12557
32876520	148	WebsterGx Holdco LLC	20-12581
32876523	159	Mallinckrodt Veterinary, Inc.	20-12582
32876527	160	Mallinckrodt Buckingham Unlimited Company	20-12558
32876533	162	Mallinckrodt Windsor Ireland Finance Unlimited Company	20-12583
32876538	161	Mallinckrodt Pharma IP Trading Unlimited Company	20-12559
32876547	163	ST US Holdings LLC	20-12560
32876548	164	Mallinckrodt Windsor S.a.r.l.	20-12584
32876552	165	Mallinckrodt Canada ULC	20-12561
32876555	166	Mallinckrodt Pharmaceuticals Ireland Limited	20-12562
32876557	167	ST US Pool LLC	20-12563
32876708	202	SpecGx LLC	20-12552
32876711	195	Mallinckrodt Brand Pharmaceuticals LLC	20-12554

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