

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

In re:  
MALLINCKRODT PLC,  
Reorganized Debtor.<sup>1</sup>

Chapter 11  
Case No. 20-12522 (BLS)

**STIPULATION OF THE OPIOID MASTER DISBURSEMENT TRUST II TRUSTEES  
AND MCKESSON CORPORATION**

The Opioid Master Disbursement Trust II Trustees, on behalf of the Opioid Master Disbursement Trust II (“Opioid MDT II”) and McKesson Corporation and certain of its affiliates listed on Appendix A hereto (collectively “McKesson” and, together with the Opioid MDT II, the “Parties”) 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”).<sup>2</sup> See D.I. 6660 (Confirmation Order), 7670 (Plan).

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<sup>1</sup> The Reorganized Debtor in this Chapter 11 case is Mallinckrodt plc. On May 3, 2023, the Court entered an order closing the Chapter 11 cases of the Reorganized Debtor’s debtor affiliates. A complete list of the debtor affiliates 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 used but not defined herein shall have the meanings ascribed to such terms in 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. On November 16-18, 2022, McKesson filed the proofs of claim listed on **Appendix B** hereto (collectively, the “Proofs of Claim”).

6. The Opioid MDT II Trustees thereafter sent McKesson a letter expressing a belief that McKesson’s Proofs of Claim were limited to preserving McKesson’s rights, if any, under certain Mallinckrodt insurance policies and do not seek any recovery from the Opioid MDT II or its assets. Counsel for McKesson and the Opioid MDT II have since conferred on the matter.

7. McKesson filed its Proofs of Claim to protect and preserve, and avoid waiving, any additional insured rights under insurance policies purchased by the Debtors. McKesson 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. McKesson’s 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 McKesson’s 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 McKesson 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 McKesson's 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 McKesson's 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 McKesson's Proofs of Claim listed on **Appendix B** hereto.

Dated: January 6, 2026  
Wilmington, Delaware

Respectfully Submitted,

**COLE SCHOTZ P.C.**

/s/ Justin R. Alberto

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**APPENDIX A**

***McKesson Parties***

- McKesson Corporation
- McKesson Canada Corporation
- McKesson Medical Surgical Inc.
- Health Mart Systems, Inc.
- PSS World Inc.
- McKesson Specialty Care Distribution Corporation
- McKesson Specialty Distribution, LLC
- McKesson Medical-Surgical Minnesota Supply Inc.

**APPENDIX B***McKesson's Subject Proofs of Claim*

<b>ClaimID</b>	<b>Claim Number</b>	<b>Claim Date Filed</b>	<b>Debtor</b>
32868587	6	11/16/2022	Mallinckrodt plc
32874071	7	11/16/2022	Acthar IP Unlimited Company
32874321	38	11/16/2022	Mallinckrodt Pharma IP Trading Unlimited Company
32874322	39	11/16/2022	Mallinckrodt Pharmaceuticals Ireland Limited
32874323	40	11/16/2022	Mallinckrodt Pharmaceuticals Limited
32874325	41	11/17/2022	Mallinckrodt Quincy S.a.r.l.
32874362	42	11/17/2022	MCCH LLC
32874364	44	11/17/2022	Mallinckrodt UK Finance LLP
32874367	43	11/17/2022	MEH, Inc.
32874369	46	11/17/2022	Mallinckrodt plc
32874370	45	11/17/2022	Mallinckrodt UK Ltd
32874371	47	11/17/2022	Mallinckrodt US Holdings LLC
32874373	48	11/17/2022	MNK 2011 LLC
32874375	49	11/17/2022	MUSHI UK Holdings Limited
32874377	50	11/17/2022	Ocera Therapeutics, Inc.
32874379	51	11/17/2022	Petten Holdings Inc.
32874382	52	11/17/2022	SpecGx Holdings LLC
32874384	53	11/17/2022	SpecGx LLC
32874387	54	11/17/2022	ST Operations LLC
32874390	55	11/17/2022	ST Shared Services LLC
32874392	56	11/17/2022	ST US Holdings LLC
32874395	57	11/17/2022	ST US Pool LLC
32874396	58	11/17/2022	Mallinckrodt US Holdings LLC
32874398	59	11/17/2022	Stratatech Corporation
32874399	64	11/17/2022	Mallinckrodt US Pool LLC
32874401	60	11/17/2022	Sucampo Holdings Inc.
32874404	61	11/17/2022	Sucampo Pharma Americas LLC
32874409	62	11/17/2022	Sucampo Pharmaceuticals, Inc.
32874420	63	11/17/2022	Therakos, Inc.
32874422	68	11/17/2022	Vtesse LLC
32874124	8	11/16/2022	IMC Exploration Company
32874126	9	11/16/2022	Infacare Pharmaceutical Corporation
32874128	10	11/16/2022	INO Therapeutics LLC
32874129	11	11/16/2022	INO Therapeutics LLC
32874131	12	11/16/2022	Ludlow LLC
32874133	13	11/16/2022	MAK LLC
32874135	14	11/16/2022	Mallinckrodt APAP LLC

32874142	15	11/16/2022	Mallinckrodt ARD Finance LLC
32874150	16	11/16/2022	Mallinckrodt ARD Holdings Limited
32874155	17	11/16/2022	Mallinckrodt ARD IP Unlimited Company
32874245	18	11/16/2022	Mallinckrodt ARD LLC
32874247	19	11/16/2022	Mallinckrodt Brand Pharmaceuticals LLC
32874266	20	11/16/2022	Mallinckrodt Buckingham Unlimited Company
32874268	21	11/16/2022	Mallinckrodt Canada ULC
32874270	22	11/16/2022	Mallinckrodt CB LLC
32874281	23	11/16/2022	Mallinckrodt Critical Care Finance LLC
32874282	24	11/16/2022	Mallinckrodt Enterprises Holdings, Inc.
32874283	25	11/16/2022	Mallinckrodt Enterprises LLC
32874284	26	11/16/2022	Mallinckrodt Enterprises UK Limited
32874287	27	11/16/2022	Mallinckrodt Equinox Finance LLC
32874290	28	11/16/2022	Mallinckrodt Group S.a.r.l.
32874294	29	11/16/2022	Mallinckrodt Holdings GmbH
32874296	30	11/16/2022	Mallinckrodt Hospital Products Inc.
32874300	31	11/16/2022	Mallinckrodt Hospital Products IP Unlimited Company
32874304	32	11/16/2022	Mallinckrodt International Finance SA
32874313	33	11/16/2022	Mallinckrodt International Holdings S.a.r.l.
32874316	34	11/16/2022	Mallinckrodt IP Unlimited Company
32874317	35	11/16/2022	Mallinckrodt LLC
32874318	36	11/16/2022	Mallinckrodt Lux IP S.a.r.l.
32874320	37	11/16/2022	Mallinckrodt Manufacturing LLC
32874423	65	11/17/2022	Mallinckrodt Veterinary, Inc.
32874426	66	11/17/2022	WebsterGx Holdco LLC
32874427	67	11/17/2022	Mallinckrodt Windsor Ireland Finance Unlimited Company
32874431	69	11/17/2022	Mallinckrodt Windsor S.a.r.l.
32876513	143	11/18/2022	Mallinckrodt ARD Holdings Inc.
32876517	147	11/18/2022	MHP Finance LLC
32876521	158	11/18/2022	MKG Medical UK Ltd