

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

In re:

November 26, Inc., *et al.*¹

Debtors.

Chapter 11

Case No. 24-12245 (KBO)

(Jointly Administered)

Hearing Date: March 27, 2026 at 2:00 p.m. (ET)

Response Deadline: March 11, 2026 at 4:00 p.m. (ET)

**DEBTORS' FIRST OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

(Superseded Claims and Insufficient Documentation Claims)

**PARTIES RECEIVING THIS NOTICE SHOULD LOCATE
THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED
ON SCHEDULES 1-2 TO THE PROPOSED ORDER**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), sustaining the first omnibus (non-substantive) objection (this “Objection”) and disallowing and expunging the claims set forth on **Schedules 1-2** to the Proposed Order (the “Disputed Claims”). In support of this Objection, the Debtors submit the *Declaration of Wen Tan in Support of the Debtors’ First Omnibus (Non-Substantive) Objection to Claims*, attached hereto as **Exhibit B** (the “Tan Declaration”). In further support of this Objection, the Debtors respectfully state as follows:

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: November 26, Inc. (f/k/a Biolase, Inc.) (2441); Nov. 26 Acquisition Corp. (f/k/a BL Acquisition Corp.) (4140); Nov. 26 Acquisition II, Inc. (f/k/a BL Acquisition II, Inc.)(6022); and Nov. 26 Office, LLC (f/k/a Model Dentist Office, LLC) (9372). The Debtors’ headquarters are located at 19800 MacArthur Blvd, Suite 820, Irvine, CA 92612.

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (“Court”) has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of these cases is proper in this district under 28 U.S.C. §§ 1408 and 1409.

2. Pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Debtors consent to entry of a final order by the Court in connection with this Objection to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith, consistent with Article III of the United States Constitution.

3. The statutory bases for the relief requested are sections 502(b) and 503(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), rules 3001 and 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rule 3007-1.

BACKGROUND

4. On October 1, 2024 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made. On October 14, 2024, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the official committee of unsecured creditors (the “Committee”). *See* Docket No. 84.

5. As of the Petition Date, the Debtors were global market leaders in the manufacturing and marketing of dental laser systems. The Debtors' proprietary systems allowed dentists, periodontists, endodontists, pediatric dentists, oral surgeons, and other dental specialists to perform a broad range of minimally invasive dental procedures, including cosmetic, restorative, and complex surgical applications. The Debtors were also developing a business-to-consumer line of business related to cosmetic and pain therapy devices.

6. Additional factual background regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the filing of these cases is set forth in the *Declaration of John R. Beaver in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 19], which is incorporated herein by reference.

7. On November 15, 2024, the Court entered an order approving, among other things, the sale of substantially all of the Debtors' assets (the "Sale"). See Docket No. 225.

8. On February 25, 2025, the Court entered the *Order Granting Final Approval of Disclosure Statement and Confirming Debtors' Chapter 11 Plan of Liquidation* [Docket No. 410], approving on a final basis and confirming the *Modified Second Amended Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Biolase, Inc. and Its Debtor Affiliates* [Docket No. 403] (the "Combined Plan and Disclosure Statement"). Although the Combined Plan and Disclosure Statement was confirmed, it has not yet gone effective in part because the Debtors have had to wind down their foreign subsidiaries.

SCHEDULES, BAR DATES, AND CLAIMS RECONCILIATION

9. On October 14, 2024, the Debtors filed their schedules of assets and liabilities and statements of financial affairs (collectively, the "Schedules"). See Docket Nos. 85–92.

10. On December 10, 2024, the Court entered an order establishing: (i) January 13, 2025 at 5:00 p.m. (prevailing Eastern Time) as the deadline for any person or entity (except governmental units) to file a proof of claim in these cases; (ii) March 31, 2025 at 5:00 p.m. (prevailing Eastern Time) as the deadline for any governmental unit to file a proof of claim in these cases; and (iii) January 13, 2025 at 5:00 p.m. (prevailing Eastern Time) as the deadline for any person or entity to file a request for allowance of an administrative expense claim that arose on or after the Petition Date through and including November 26, 2024. *See* Docket No. 278. Except as otherwise provided in the Bar Date Order, the Bar Date generally applies to all types of claims against the Debtors that arose before the Petition Date, including secured claims, priority claims, general unsecured claims, and claims entitled to priority under section 503(b)(9) of the Bankruptcy Code.

11. In the ordinary course of business, the Debtors maintained books and records that reflected, among other things, the nature and amount of the liabilities owed to their creditors. As part of these chapter 11 cases, the Debtors filed the Schedules and Statements reflecting the obligations owed to their creditors as of the Petition Date. The Debtors, together with their advisors, have engaged in a review of the proofs of claim, working diligently to review, compare, and reconcile the proofs of claim against the Debtors' books and records.²

² Except as otherwise defined herein, all terms used in this Objection that are specifically defined in the Bankruptcy Code shall have the meanings ascribed to such terms in the Bankruptcy Code. In particular, as used herein: (a) the term "claim" has the meaning given to it in section 101(5) of the Bankruptcy Code; (b) the term "entity" has the meaning given to it in section 101(15) of the Bankruptcy Code; (c) the term "governmental unit" has the meaning given to it in section 101(27) of the Bankruptcy Code; and (d) the term "person" has the meaning given to it in section 101(41) of the Bankruptcy Code.

RELIEF REQUESTED

12. The Debtors respectfully request that the Court enter the Proposed Order, disallowing and expunging the Disputed Claims, as indicated in further detail below and on Schedules 1–2 to the Proposed Order.

BASIS FOR RELIEF REQUESTED

13. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). The burden of proof for determining the validity of claims rests on different parties at different stages of the claim objection process. As explained by the United States Court of Appeals for the Third Circuit:

The burden of proof for claims brought in the bankruptcy court under 11 U.S.C.A. § 502(a) rests on different parties at different times. Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is “*prima facie*” valid. In other words, a claim that alleges facts sufficient to support legal liability to the claimant satisfies the claimants’ initial obligation to go forward. The burden of going forward then shifts to the objector to produce evidence sufficient to negate the *prima facie* validity of the filed claim. . . . In practice, the objector must produce evidence which, if believed, would refute at least one of the allegations that is essential to the claim’s legal sufficiency. If the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence.

In re Allegheny Int’l Inc., 954 F.2d 167, 173–74 (3d Cir. 1992) (internal citations omitted). “The claimant bears the ultimate burden of establishing a valid administrative expense claim[, including a claim under section 503(b)(9) of the Bankruptcy Code,] by a preponderance of the evidence.” *In re SRC Liquidation, LLC*, 573 B.R. 537, 540 (Bankr. D. Del. 2017) (citing *In re Allegheny Int’l Inc.*, 954 F.2d at 173–74). Pursuant to Bankruptcy Rule 3007(d), a debtor may file an omnibus objection to claims on certain enumerated bases. Fed. R. Bankr. P. 3007(d). Local Rule 3007-1(c)

provides that an omnibus objection is deemed to be made on a non-substantive basis if it is based on one of the grounds enumerated therein, including that a claim has been amended or superseded and that a claim does not have a basis in the Debtors' books and records and does not include documentation sufficient to constitute prima facie evidence of the validity and amount of the claim. Del. Bankr. L.R. 3007-1(c)(iii), (vi).

14. As explained further below, the Disputed Claims are, in whole or in part, not enforceable against the Debtors and should be disallowed.

OBJECTION TO DISPUTED CLAIMS

A. Superseded Claims

15. Each of the Disputed Claims listed on Schedule 1 to the Proposed Order (collectively, the "Superseded Claims") has been amended or superseded by one or more subsequently filed claims. After reviewing the Superseded Claims and the claims register, the Debtors have determined that each of the Superseded Claims has been superseded by a subsequently filed claim and should be disallowed and expunged, as indicated on Schedule 1 to the Proposed Order.

16. Accordingly, subject to further objection by the Debtors and their estates, the Debtors object to the Superseded Claims and request entry of the Proposed Order disallowing and expunging each of the Superseded Claims as indicated on Schedule 1 to the Proposed Order.

B. Insufficient Documentation Claims

17. Each of the Disputed Claims listed on Schedule 2 to the Proposed Order (collectively, the "Insufficient Documentation Claims") does not have a basis in the Debtors' books and records and does not include or attach information or documents sufficient to constitute prima facie evidence of the validity and amount of such claim under Bankruptcy Rule 3001(f).

18. In accordance with Local Rule 3007-1(c)(vi), this Objection is supported by the Tan Declaration, which states that the declarant: (i) has reviewed the claims and all supporting information and documents provided with the claims, (ii) believes that the documentation does not provide prima facie evidence of the validity and amount of the claims, and (iii) cannot ascertain a basis for the claims after a reasonable review of the Debtors' books and records.

19. Accordingly, subject to further objection by the Debtors and their estates, the Debtors object to the Insufficient Documentation Claims and request entry of the Proposed Order disallowing and expunging each of the Insufficient Documentation Claims as indicated on Schedule 2 to the Proposed Order.

RESPONSES TO THIS OBJECTION

20. Any responses to this Objection must be filed **on or before 4:00 p.m. (ET) on March 11, 2026**, in accordance with the procedures set forth in the notice of this Objection.

21. Each Response must be filed and served upon the following entities at the following addresses: (a) the Office of the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, (b) Pillsbury Winthrop Shaw Pittman LLP, 31 West 52nd Street, New York, New York 10019, Attn: Dania Slim, and (c) Potter Anderson and Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware 19801, Attn: Brett M. Haywood and Maria Kotsiras.

22. A hearing to consider this Objection will be held on March 27, 2026, at 2:00 p.m. (prevailing Eastern Time), before the Honorable Karen B. Owens, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 6th Floor, Courtroom #3, Wilmington, Delaware 19801 (the "Hearing").

23. Timely Response Required; Hearing; Replies: If a claimant whose Disputed Claim is subject to this Objection, and who is served with this Objection, fails to file and serve a timely

Response in compliance with the foregoing procedures, the Debtors will present to the Court an appropriate order disallowing and expunging the Disputed Claim without further notice to the claimant.

24. If a Response is properly and timely filed and served in accordance with the above procedures, the Debtors will endeavor to reach a consensual resolution with the claimant. If no consensual resolution is reached, the Court will conduct the Hearing with respect to this Objection and the Response(s) March 27, 2026 at 2:00 p.m. (ET), or such other date and time as parties filing Responses may be notified. Only those Responses made in writing and timely filed and received will be considered by the Court at any such Hearing.

25. Adjournment of Hearing: The Debtors reserve the right to adjourn the Hearing on any Disputed Claim included in this Objection. In the event that the Debtors adjourn the Hearing, they will state that the Hearing on that particular Disputed Claim has been adjourned on the agenda for the Hearing on this Objection, which agenda will be served on the person designated by the claimant in its Response.

26. Separate Contested Matter: Each of the Disputed Claims and the Debtors' objection(s) thereto as asserted in this Objection constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. The Debtors request that any order entered by the Court with respect to an objection asserted herein will be deemed a separate order with respect to each such Disputed Claim.

RESERVATION OF RIGHTS

27. The Debtors reserve the right to adjourn the hearing on any Disputed Claim, and in the event that the Debtors do so, the Debtors will state the same in the agenda for the hearing on that Disputed Claim, which agenda will be served on the claimant(s).

28. The Debtors and their estates reserve any and all rights to amend, supplement or otherwise modify this Objection, the Proposed Order, or Schedules 1–2 thereto and to file additional objections to any and all claims filed in these chapter 11 cases, including any and all of the Disputed Claims. The Debtors and their estates also reserve any and all rights, claims and defenses with respect to any and all of the Disputed Claims, and nothing included in or omitted from this Objection, the Proposed Order, or Schedules 1–2 thereto is intended or shall be deemed to impair, prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtors and their estates with respect to the Disputed Claims.

COMPLIANCE WITH LOCAL RULE 3007-1

29. In accordance with Local Rule 3007-1(d)(i)(E), the undersigned representative of the Debtors has reviewed the requirements of Local Rule 3007-1 and certifies that this Objection substantially complies with that Local Rule. To the extent that the Objection does not comply in all respects with the requirements of Local Rule 3007-1, the Debtors believe such deviations are not material and respectfully request that any such requirement be waived.

NOTICE

30. Notice of this Objection will be provided to: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Internal Revenue Service; (d) the Securities and Exchange Commission; (e) the United States Attorney’s Office for the District of Delaware; (f) the state attorneys general for all states in which the Debtors conduct business; (g) Holland & Knight LLP, as counsel to SWK Funding LLC; (h) the U.S. Small Business Administration; (i) Banc of California; (j) Bank of America, N.A.; (k) each of the claimants whose claim is subject to this Objection; and (l) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors respectfully submit that, in light of the nature of the relief requested, no further notice is necessary.

NO PRIOR REQUEST

31. No prior motion for the relief requested herein has been made to this or any other court.

WHEREFORE, the Debtors respectfully request that this Court grant (i) the relief requested in this Objection by entering the Proposed Order and (ii) such other and further relief as this Court deems just and proper.

Dated: February 18, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Maria Kotsiras

M. Blake Cleary (No. 3614)

Brett M. Haywood (No. 6166)

Maria Kotsiras (No. 6840)

Shannon A. Forshay (No. 7293)

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Counsel to the Debtors and Debtors in Possession

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

In re:

November 26, Inc., *et al.*¹

Debtors.

Chapter 11

Case No. 24-12245 (KBO)

(Jointly Administered)

Hearing Date: March 27, 2026 at 2:00 p.m. (ET)

Response Deadline: March 11, 2026 at 4:00 p.m. (ET)

**NOTICE OF DEBTORS' FIRST OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (the “Debtors”), filed the *Debtors’ First Omnibus (Non-Substantive) Objection to Claims* (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). **Your claim(s) may be modified and/or disallowed as a result of the Objection.** **Therefore, you should read the attached Objection carefully.**

PLEASE TAKE FURTHER NOTICE THAT YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION AND BY ANY FURTHER CLAIM OBJECTION THAT MAY BE FILED BY THE DEBTORS OR OTHERWISE. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS’ RIGHT TO PURSUE FURTHER OBJECTIONS AGAINST YOUR CLAIM(S) SUBJECT TO THE OBJECTION IN ACCORDANCE WITH APPLICABLE LAW AND APPLICABLE ORDERS OF THE COURT.

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: November 26, Inc. (f/k/a Biolase, Inc.) (2441); Nov. 26 Acquisition Corp. (f/k/a BL Acquisition Corp.) (4140); Nov. 26 Acquisition II, Inc. (f/k/a BL Acquisition II, Inc.)(6022); and Nov. 26 Office, LLC (f/k/a Model Dentist Office, LLC) (9372). The Debtors’ headquarters are located at 19800 MacArthur Blvd, Suite 820, Irvine, CA 92612.

PLEASE TAKE FURTHER NOTICE that, if the holder of a claim that is the subject of the Objection wishes to respond to the Objection, the holder must file a written response with the Court and serve it on the undersigned counsel so as to be received on or before **March 11, 2026 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, responses to the Objection must contain, at a minimum, the following: (a) a caption setting forth the name of the Court, the above-referenced case number and the title of the Objection to which the response is directed; (b) the name of the claimant, his/her/its claim number, and a description of the basis for the amount of the claim; (c) the specific factual basis and supporting legal argument upon which the claimant will rely in opposing this Objection; (d) any supporting documentation, to the extent it was not included with the proof of claim previously filed with the clerk or claims agent, upon which the claimant will rely to support the basis for and amounts asserted in the proof of claim; and (e) the name, address, email address, telephone number, and fax number of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the Objection to the disputed claim on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE that, if no response to the Objection is timely filed and received in accordance with the above procedures, an order may be entered sustaining the Objection without further notice or hearing. If a response is properly filed, served and received in accordance with the above procedures and such response is not resolved, a hearing to consider such response and the Objection will be held before the Honorable Karen B. Owens, United States Bankruptcy Court, 824 North Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801 on **March 27, 2026 at 2:00 p.m. (ET)** (the "Hearing"). Only a response made in writing

and timely filed and received will be considered by the Court at the Hearing.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY SUSTAIN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 18, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Maria Kotsiras

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Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

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

In re:

November 26, Inc., *et al.*¹

Debtors.

Chapter 11

Case No. 24-12245 (KBO)

(Jointly Administered)

Re: Docket No. ____

**ORDER SUSTAINING DEBTORS' FIRST OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

Upon consideration of the *Debtors' First Omnibus (Non-Substantive) Objection to Claims* (the "Objection")² and the Tan Declaration; and having determined that this Court has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and having determined that venue of these chapter 11 cases and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and having determined that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors and other parties in interest; and having determined that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefore,

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are: November 26, Inc. (f/k/a Biolase, Inc.) (2441); Nov. 26 Acquisition Corp. (f/k/a BL Acquisition Corp.) (4140); Nov. 26 Acquisition II, Inc. (f/k/a BL Acquisition II, Inc.) (6022); and Nov. 26 Office, LLC (f/k/a Model Dentist Office, LLC) (9372). The Debtors' headquarters are located at 19800 MacArthur Blvd, Suite 820, Irvine, CA 92612.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Subject to further objection by the Debtors and their estates, the Superseded Claims identified on Schedule 1 to this Order are hereby disallowed and expunged in their entirety, as indicated on Schedule 1 to this Order.
3. Subject to further objection by the Debtors and their estates, the Insufficient Documentation Claims identified on Schedule 2 to this Order are hereby disallowed and expunged in their entirety, as indicated on Schedule 2 to this Order.
4. The Debtors and Epiq Corporate Restructuring, LLC (“Epiq”), are authorized to take all actions necessary and appropriate to give effect to this Order.
5. Epiq is authorized to modify the claims register to comport with the relief granted by this Order.
6. The Debtors’ objection to each Disputed Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
7. Any and all rights of the Debtors and their estates to amend, supplement or otherwise modify the Objection and to file additional objections to any and all claims filed in these chapter 11 cases, including, without limitation, any and all of the Disputed Claims, shall be reserved. Any and all rights, claims and defenses of the Debtors and their estates with respect to any and all of the Disputed Claims shall be reserved, and nothing included in or omitted from the

Objection is intended or shall be deemed to impair, prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtors and their estates with respect to the Disputed Claims.

8. This Court shall retain jurisdiction over any and all affected parties with respect to any and all matters, claims or rights arising from or related to the implementation or interpretation of this Order.

SCHEDULE 1

Superseded Claims

Schedule 1
Superseded Claims

Claimant Name	Claim No.	Asserted Claim Class	Asserted Claim Amount	Modified Claim Class	Modified Claim Amount	Reason for Modification
Buckley, Jim	30018	Administrative Expense Request	\$ 100,000.00	Disallowed (Superseded)	\$0.00	Claim No. 30018 has been amended and superseded by later-filed Claim No. 30024. Pursuant to D. Del. L.R. 3007-1(c)(iii), claims that have been amended or superseded may be removed from the claims register through a nonsubstantive omnibus objection. The Debtors' review of the claims register confirms that Claim No. 30024 amends and supersedes Claim No. 30018. Accordingly, the Debtors seek to expunge Claim No. 30018 as superseded and treat Claim No. 30024 as the operative claim.
Purcell, Lauren	30006	Administrative Expense Request	\$ 100,000.00	Disallowed (Superseded)	\$0.00	Claim No. 30006 has been amended and superseded by later-filed Claim No. 30013. Pursuant to D. Del. L.R. 3007-1(c)(iii), claims that have been amended or superseded may be removed from the claims register through a nonsubstantive omnibus objection. The Debtors' review of the claims register confirms that Claim No. 30013 amends and supersedes Claim No. 30006. Accordingly, the Debtors seek to expunge Claim No. 30006 as superseded and treat Claim No. 30013 as the operative claim.
Sotherden, Scott	30008	Administrative Expense Request	\$ 42,500.00	Disallowed (Superseded)	\$0.00	Claim No. 30008 has been amended and superseded by later-filed Claim No. 30023. Pursuant to D. Del. L.R. 3007-1(c)(iii), claims that have been amended or superseded may be removed from the claims register through a nonsubstantive omnibus objection. The Debtors' review of the claims register confirms that Claim No. 30023 amends and supersedes Claim No. 30008. Accordingly, the Debtors seek to expunge Claim No. 30008 as superseded and treat Claim No. 30023 as the operative claim.
Sotherden, Scott	30009	Administrative Expense Request	\$ 55,000.00	Disallowed (Superseded)	\$0.00	Claim No. 30009 has been amended and superseded by later-filed Claim Nos. 30021 and 30022. Pursuant to D. Del. L.R. 3007-1(c)(iii), claims that have been amended or superseded may be removed from the claims register through a nonsubstantive omnibus objection. The Debtors' review of the claims register confirms that Claim Nos. 30021 and 30022 were filed as amendments to Claim No. 30009, and that Claim No. 30022 is the most recent amended claim. Accordingly, the Debtors seek to expunge Claim No. 30009 as superseded and treat Claim No. 30022 as the operative claim.
Sotherden, Scott	30021	Administrative Expense Request	\$ 55,000.00	Disallowed (Superseded)	\$0.00	Claim No. 30021 was filed as an amendment to Claim No. 30009 but has been amended and superseded by later-filed Claim No. 30022. Pursuant to D. Del. L.R. 3007-1(c)(iii), claims that have been amended or superseded may be removed from the claims register through a nonsubstantive omnibus objection. The Debtors' review of the claims register confirms that Claim No. 30022 amends and supersedes Claim No. 30021. Accordingly, the Debtors seek to expunge Claim No. 30021 as superseded and treat Claim No. 30022 as the operative claim.

SCHEDULE 2

Insufficient Documentation Claims

Schedule 2
Insufficient Documentation Claims

Claimant Name	Claim No.	Asserted Claim Class	Asserted Claim Amount	Modified Claim Class	Modified Claim Amount	Reason for Modification
Airways Freight Corporation	30025	Administrative Expense Request	\$ 900.00	Disallowed	\$0.00	No invoices, BOLs, or itemization provided were attached to the proof of claim. After a review of Debtors' books and records, Debtors cannot verify the liability or amount of the proof of claim. Objected to as lacking prima facie support under Fed. R. Bankr. P. 3001(f) and D. Del. L.R. 3007-1(c)(vi).

EXHIBIT B

Tan Declaration

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

In re:

November 26, Inc., *et al.*¹

Debtors.

Chapter 11

Case No. 24-12245 (KBO)

(Jointly Administered)

**DECLARATION OF WEN TAN IN SUPPORT OF
DEBTORS' FIRST OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

I, Wen Tan, pursuant to 28 U.S.C. § 1746, declare:

1. I am Associate Director with GlassRatner Advisory & Capital Group, LLC, formerly B. Riley Advisory Services (“GlassRatner”). GlassRatner currently serves as financial advisor to the above-captioned debtors (collectively, the “Debtors”). Based on my work with the Debtors and my oversight of the work that GlassRatner has performed for the Debtors, my review of relevant documents, and my discussions with other professionals, I am familiar with the Debtors’ books and records and am one of the persons responsible for overseeing the claims reconciliation and objection process in these chapter 11 cases.

2. I have read the *Debtors’ First Omnibus (Non-Substantive) Objection to Claims* (the “Objection”),² and am directly, or by and through other personnel or representatives of the Debtors, reasonably familiar with the information contained therein, the Proposed Order, and the schedules attached to the Proposed Order.

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: November 26, Inc. (f/k/a Biolase, Inc.) (2441); Nov. 26 Acquisition Corp. (f/k/a BL Acquisition Corp.) (4140); Nov. 26 Acquisition II, Inc. (f/k/a BL Acquisition II, Inc.) (6022); and Nov. 26 Office, LLC (f/k/a Model Dentist Office, LLC) (9372). The Debtors’ headquarters are located at 19800 MacArthur Blvd, Suite 820, Irvine, CA 92612.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

3. Considerable resources and time have been expended in reviewing and reconciling the proofs of claims filed in these chapter 11 cases. These claims were carefully reviewed and analyzed in good faith using due diligence by the appropriate personnel and a review of the Debtors' books and records. These efforts resulted in the identification of the Disputed Claims.

4. The information in Schedules 1-2 to the Proposed Order is true and correct to the best of my knowledge, information and belief.

5. The Debtors have reviewed their books and records and the claims register, and have determined that the Superseded Claims have been amended or superseded by one or more subsequently filed claims and should be disallowed and expunged as indicated on Schedule 1 to the Proposed Order. The elimination of the Superseded Claims will streamline the claims reconciliation process and enable Debtors to maintain more accurate records and register and to avoid paying twice on account of the same obligation.

6. The Debtors have reviewed the Insufficient Documentation Claims, all supporting information and documents provided with such claims, and the Debtors' books and records. To the best of my knowledge and belief, the claim listed on Schedule 2: (i) does not provide sufficient information to indicate the existence, validity or amount of a claim, (ii) does not attach any documentation or reference to documentation that would indicate the existence, validity or amount of a debt or claim, and (iii) the Debtors' books and records do not provide a basis for the existence, validity or amount of the claim. Without limiting the generality of the foregoing, through my professionals and advisors, I have reviewed the underlying claim, caused a review of the Debtors' books and records for information related to the claim including, but not limited to, a review of the Schedules [Docket Nos. 85-88] and the Debtors'

creditor matrix [Docket No. 21]. Based on this review, I believe that the documentation provided with the Insufficient Documentation Claims does not constitute prima facie evidence of the validity and amount of such claims under Bankruptcy Rule 3001(f). Accordingly, the Debtors seek to disallow and expunge the Insufficient Documentation Claims as indicated on Schedule 2 to the Proposed Order.

7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on February 18, 2026

/s/ Wen Tan

Wen Tan

Associate Director