

**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' SECOND OMNIBUS
(SUBSTANTIVE) OBJECTION TO CLAIMS**

**(Reclassified 503(b)(9) Claims, Reclassified Administrative Claims, Unvested Equity
Award Claims and Assumed Contract Claims)**

**PARTIES RECEIVING THIS NOTICE SHOULD LOCATE
THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED
ON SCHEDULES 1–4 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 second omnibus (substantive) objection (this “Objection”) and disallowing and expunging the claims set forth on **Schedules 1–4** 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’ Second Omnibus (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 respectively request that the Court enter the Proposed Order, reclassifying, modifying, or disallowing and expunging the Disputed Claims, as indicated in further detail below and on Schedules 1–5 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 is permitted to file omnibus objections to more than one claim on the bases enumerated therein which include, among

other things, that such claims “[do] not comply with applicable rules, and the objection states that the objector is unable to determine the validity of the claim because of the noncompliance.” Fed. R. Bankr. P. 3007(d)(6).

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

OBJECTION TO DISPUTED CLAIMS

A. Reclassified 503(b)(9) Claims

15. Each of the Disputed Claims listed on Schedule 1 to the Proposed Order (collectively, the “Reclassified 503(b)(9) Claims”) asserts that the claim is entitled to administrative priority status pursuant to section 503(b)(9) of the Bankruptcy Code. Section 503(b)(9) of the Bankruptcy Code grants an administrative priority claim for “the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.” 11 U.S.C. § 503(b)(9). In order to establish entitlement to a section 503(b)(9) claim, a claimant must prove by a preponderance of the evidence that “(1) the vendor sold ‘goods’ to the debtor; (2) the goods were received by the debtor within twenty days [before the bankruptcy] filing; and (3) the goods were sold . . . in the ordinary course of business.” *In re World Imports, Ltd.*, 862 F.3d 338, 341 (3d Cir. 2017) (quoting *In re Goody’s Fam. Clothing, Inc.*, 401 B.R. 131, 133 (Bankr. D. Del. 2009)).

16. After reviewing the Reclassified 503(b)(9) Claims and reconciling them against the Debtors’ books and records, the Debtors have determined that such claims should be reclassified to general unsecured claims, in whole or in part, as indicated on Schedule 1 to the Proposed Order.

17. Specifically, the Reclassified 503(b)(9) Claims are not valid claims pursuant to section 503(b)(9) of the Bankruptcy Code because they assert: (i) claims for services or other nontangible items rather than goods, or otherwise do not assert a claim on account of a sale of goods within the meaning of section 503(b)(9); or (ii) claims for goods that were received by the Debtors outside of the 20-day period under section 503(b)(9) (*i.e.*, earlier than September 11, 2024 or later than September 30, 2024) or are otherwise invalid section 503(b)(9) claims for the reasons set forth on Schedule 1 to the Proposed Order. As a result, the Reclassified 503(b)(9) Claims should be reclassified as general unsecured claims, in whole or in part, as indicated in the columns titled “Modified Claim Class” and “Modified Claim Amount” on Schedule 1 to the Proposed Order. Any failure to reclassify the Reclassified 503(b)(9) Claims as indicated on Schedule 1 to the Proposed Order would award the claimants undue administrative priority status to the detriment of other creditors in these chapter 11 cases.

18. Accordingly, subject to further objection by the Debtors and their estates, the Debtors object to the Reclassified 503(b)(9) Claims, and request entry of the Proposed Order reclassifying each of the Reclassified 503(b)(9) Claims to general unsecured claims, as indicated on Schedule 1 to the Proposed Order.

B. Non-Employee Claims Reclassified to General Unsecured Claims

19. Each of the Disputed Claims listed on Schedule 2 to the Proposed Order (collectively, the “Reclassified Administrative Claims”) asserts that the claim is entitled to administrative priority status pursuant to section 503 of the Bankruptcy Code. After reviewing the Reclassified Administrative Claims and reconciling them against the Debtors’ books and records, the Debtors have determined that such claims should be reclassified to general unsecured claims, in whole or in part, as indicated on Schedule 2 to the Proposed Order.

20. Specifically, the Reclassified Administrative Claims are not entitled, under the Bankruptcy Code or otherwise, to administrative expense priority because they assert obligations that are prepetition in nature or otherwise do not constitute actual, necessary costs and expenses of preserving the Debtors' estates. As a result, the Reclassified Administrative Claims should be reclassified as general unsecured claims, in whole or in part, as indicated in the columns titled "Modified Claim Class" and "Modified Claim Amount" on Schedule 2 to the Proposed Order. Any failure to reclassify the Reclassified Administrative Claims as indicated on Schedule 2 to the Proposed Order would award the claimants undue administrative status to the detriment of other creditors in these chapter 11 cases.

21. Accordingly, subject to further objection by the Debtors and their estates, the Debtors object to the Reclassified Administrative Claims and request entry of the Proposed Order reclassifying each of the Reclassified Administrative Claims to general unsecured claims, as indicated on Schedule 2 to the Proposed Order.

C. Disallowance of Unvested Equity and Incentive Award Claims

22. Each of the Disputed Claims listed on Schedule 3 to the Proposed Order (collectively, the "Unvested Equity Award Claims") asserts that the claim is entitled to administrative priority status or seeks allowance of amounts allegedly owed in connection with unvested or contingent equity or incentive awards. After reviewing the Unvested Equity Award Claims and reconciling them against the Debtors' books and records, the Debtors have determined that such claims should be disallowed and expunged, in whole or in part, as indicated on Schedule 4 to the Proposed Order.

23. Specifically, the Unvested Equity Award Claims are not enforceable against the Debtors and should be disallowed because, as of the Petition Date, the amounts asserted were

unvested, contingent, or forfeitable and therefore do not constitute allowable claims against the Debtors' estates. As a result, the Unvested Equity Award Claims should be disallowed and expunged, in whole or in part, as indicated in the columns titled "Modified Claim Class" and "Modified Claim Amount" on Schedule 3 to the Proposed Order. Any failure to disallow and expunge the Unvested Equity Award Claims as indicated on Schedule 3 to the Proposed Order would award the claimants undue administrative status to the detriment of other creditors in these chapter 11 cases.

24. Accordingly, subject to further objection by the Debtors and their estates, the Debtors object to the Unvested Equity Award Claims and request entry of the Proposed Order disallowing and expunging each of the Unvested Equity Award Claims as indicated on Schedule 3 to the Proposed Order.

D. Assumed Contract Claims

25. Each of the Disputed Claims listed on Schedule 4 to the Proposed Order (collectively, the "Assumed Contract Claims") asserts that the Debtors are liable for amounts allegedly due under an agreement that was assumed and assigned in connection with the Sale. After reviewing the Assumed Contract Claims and reconciling them against the Debtors' books and records, the Debtors have determined that such claims should be disallowed and expunged, in whole or in part, as indicated on Schedule 4 to the Proposed Order.

26. Specifically, the Assumed Contract Claims are not enforceable against the Debtors because the applicable agreement was assumed and assigned in connection with the Sale. Consequently, any post-closing obligations are not obligations of the Debtors' estates. As a result, the Assumed Contract Claims should be disallowed and expunged, in whole or in part, as indicated in the columns titled "Modified Claim Class" and "Modified Claim Amount" on Schedule 4 to the

Proposed Order. Any failure to disallow and expunge the Assumed Contract Claims as indicated on Schedule 4 to the Proposed Order would permit the claimant to seek recovery from the Debtors' estates for obligations that are not properly payable by the Debtors.

27. Accordingly, subject to further objection by the Debtors and their estates, the Debtors object to the Assumed Contract Claims and request entry of the Proposed Order disallowing and expunging each of the Assumed Contract Claims as indicated on Schedule 4 to the Proposed Order.

RESPONSES TO THIS OBJECTION

28. 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.

29. 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.

30. 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").

31. 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.

32. 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.

33. 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.

34. 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

35. 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).

36. The Debtors and their estates reserve any and all rights to amend, supplement or otherwise modify this Objection, the Proposed Order, or Schedules 1–4 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 1–4 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

37. 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

38. 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

39. 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)

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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' SECOND OMNIBUS
(SUBSTANTIVE) OBJECTION TO CLAIMS**

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (the “Debtors”), filed the *Debtors’ Second Omnibus (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' SECOND OMNIBUS
(SUBSTANTIVE) OBJECTION TO CLAIMS**

Upon consideration of the *Debtors' Second Omnibus (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 Reclassified 503(b)(9) Claims identified on Schedule 1 to this Order are hereby reclassified as general unsecured claims, as indicated in the column titled “Modified Claim Class” on Schedule 1 to this Order.
3. The Reclassified Administrative Claims identified on Schedule 2 to this Order are hereby reclassified as general unsecured claims, as indicated in the column titled “Modified Claim Class” on Schedule 2 to this Order.
4. The Unvested Equity Award Claims identified on Schedule 3 to this Order are hereby disallowed and expunged, in whole or in part, as indicated on Schedule 3 to this Order.
5. The Assumed Contract Claims identified on Schedule 4 to this Order are hereby disallowed and expunged, in whole or in part, as indicated on Schedule 4 to this Order.
6. The Debtors and Epiq Corporate Restructuring, LLC (“Epiq”), are authorized to take all actions necessary and appropriate to give effect to this Order.
7. Epiq is authorized to modify the claims register to comport with the relief granted by this Order.
8. 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.

9. 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.

10. 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

Reclassified 503(b)(9) Claims

Schedule 1
Reclassified 503(b)(9) Claims

Claimant Name	Claim No.	Asserted Claim Class	Asserted Claim Amount	Modified Claim Class	Modified Claim Amount	Reason for Modification
Hewlett-Packard Financial Services Co.	10024	Lease; asserted 503(b)(9)	\$ 24,514.62	GUC (limit to \$4,045.84 prepetition)	\$ 4,045.84	Claim 10024 improperly asserts a § 503(b)(9) priority for lease rental obligations. Section 503(b)(9) covers the "value of goods received" within 20 days prepetition (11 U.S.C. § 503(b)(9)); it does not apply to pure equipment lease payments. The claimant's own schedule allocates \$4,045.84 as prepetition; the remaining amounts are postpetition/future rent and are not allowable as prepetition § 503(b)(9) claims. Accordingly, debtor seeks reclassification to GUC of the prepetition amount (\$4,045.84) and disallowance of the asserted § 503(b)(9) portion (and disallowance of any postpetition/future rent asserted as a prepetition claim). Supporting authority: 11 U.S.C. § 503(b)(9); Fed. R. Bankr. P. 3001(f).
Pappas, Robert J	10062	Employee incentive; asserted 503(b)(9)	\$ 100,000.00	Disallowed	\$0.00	Claim No. 10062 improperly asserts priority under 11 U.S.C. § 503(b)(9) for an employee time-based incentive award. Section 503(b)(9) applies only to goods sold to the debtor and does not encompass contingent or unvested compensation. The attached award letter shows that the \$100,000 award is time-vested and forfeitable, with no vested amount as of the Petition Date. Accordingly, the Debtors object to the asserted § 503(b)(9) priority and seek disallowance of the claim as an administrative expense and as a general unsecured claim to the extent unsupported.
West, David	10082	Employee expense reimbursement; asserted 503(b)(9)	\$ 16,595.31	GUC (non-503(b)(9))	\$ 16,595.31	Claim No. 10082 improperly asserts priority under 11 U.S.C. § 503(b)(9) for employee expense reimbursements. The claimant attaches expense screenshots rather than invoices reflecting goods sold; accordingly, § 503(b)(9) does not apply. The Debtors object to the § 503(b)(9) characterization and reclassify the claim as a non-§ 503(b)(9) general unsecured claim, without prejudice to further review of any portion properly supported as a postpetition administrative expense. (11 U.S.C. § 503(b)(9); Fed. R. Bankr. P. 3001(f).)
Whipp, Richard	35	Employee wages/benefits; asserted 503(b)(9) + priority	\$ 19,603.86	GUC (non-503(b)(9))	\$ 19,603.86	Claim No. 35 asserts wages and benefits and also claims entitlement to priority under 11 U.S.C. § 503(b)(9). Wages and benefits are not "goods sold" within the meaning of § 503(b)(9). The Debtors object to the § 503(b)(9) characterization and reclassify any properly documented wage claim under 11 U.S.C. § 507(a)(4) to the extent allowable. Absent supporting payroll records and earnings dates, reclassification to general unsecured status is appropriate. (11 U.S.C. §§ 503(b)(9), 507(a)(4); Fed. R. Bankr. P. 3001(f).)

SCHEDULE 2

Reclassified Administrative Claims

Schedule 2
Reclassified Administrative Claims

Claimant Name	Claim No.	Asserted Claim Class	Asserted Claim Amount	Modified Claim Class	Modified Claim Amount	Reason for Modification
AccuSourceHR, Inc. (Frasco Profiles)	30003	Administrative Expense Request	\$ 565.32	GUC	\$ 565.32	Claim No. 30003 is filed as an administrative expense, but the supporting invoice covers the period June 1, 2024 through July 1, 2024 (prepetition). The claimant has not demonstrated entitlement to administrative priority under 11 U.S.C. § 503(b). Accordingly, the Debtors object and reclassify the claim as a general unsecured claim. (11 U.S.C. § 503(b); D. Del. L.R. 3007-1(c).)
Adams, Jeremy	30005	Administrative Expense Request (refund demand)	\$ 8,013.58	GUC (disputed)	\$ 8,013.58	Claim No. 30005 is a customer refund/RMA request relating to a November 2024 purchase and is not properly treated as an administrative expense of the estate absent contractual or equitable grounds. The Debtors dispute the claim; absent proof of an enforceable refund right or approved return, the claim is reclassified as a general unsecured disputed claim. (Fed. R. Bankr. P. 3001; D. Del. L.R. 3007-1.)
Blake, Maria D	30010	Administrative Expense Request (PTO payout)	\$ 5,619.23	GUC	\$ 5,619.23	Claim No. 30010 requests PTO/vacation payout but provides only general FAQs and no payroll or accrual documentation. The filing does not establish a postpetition administrative entitlement. The Debtors object and reclassify the claim as general unsecured; any priority under 11 U.S.C. § 507(a)(4) may be allowed only to the extent properly documented. (11 U.S.C. § 507(a)(4); D. Del. L.R. 3007-1(c)(vi).)
Meza, Fernando, Dr	30027	Administrative Expense Request (honorarium)	\$ 4,000.00	GUC	\$ 4,000.00	Claim No. 30027 relates to a clinician honorarium tied to an August 30, 2024 engagement (prepetition). The claim does not demonstrate a postpetition estate-preserving benefit and is therefore reclassified as a prepetition general unsecured claim. (11 U.S.C. § 503(b); Fed. R. Bankr. P. 3001.)
Pantoja, Pedro	30007	Administrative Expense Request (PTO payout)	\$ 5,045.79	GUC	\$ 5,045.79	Claim No. 30007 asserts accrued vacation but attaches only internal HR emails and no payroll ledger or accrual records. The claimant has not demonstrated postpetition accrual or administrative priority. The Debtors object and reclassify the claim as general unsecured; any priority under 11 U.S.C. § 507(a)(4) is allowable only to the extent properly documented. (11 U.S.C. § 507(a)(4); D. Del. L.R. 3007-1(c)(vi).)
Ross, Stephen E	30014	Administrative Expense Request (employee expense reimburse.)	\$ 10,675.25	GUC	\$ 10,675.25	Claim No. 30014 seeks reimbursement of employee expenses with receipts spanning pre- and postpetition dates but does not allocate amounts to demonstrate an actual and necessary postpetition benefit to the estate. The Debtors object and reclassify the claim as general unsecured absent a supported showing under 11 U.S.C. § 503(b)(1)(A). (11 U.S.C. § 503(b)(1)(A); D. Del. L.R. 3007-1.)
Sotherden, Scott	30022	Administrative Expense Request (wages)	\$ 55,000.00	GUC	\$ 55,000.00	Claim No. 30022 amends Claim No. 30009 but does not allocate prepetition versus postpetition compensation or provide supporting payroll documentation. The claimant has not met the burden required to establish administrative priority. The Debtors object and reclassify the claim as general unsecured. (11 U.S.C. § 503(b); D. Del. L.R. 3007-1(c)(iii), (vi).)
Sotherden, Scott	30023	Administrative Expense Request (wages)	\$ 42,858.55	GUC	\$ 42,858.55	Claim No. 30023 amends Claim No. 30008 and increases the asserted amount but provides no documentation establishing any postpetition administrative entitlement. The Debtors object and reclassify the claim as general unsecured for omnibus objection purposes. (D. Del. L.R. 3007-1(c)(iii), (vi).)
Swiney, Luke	30011	Administrative Expense Request (incentive shortfall)	\$ 50,379.07	GUC	\$ 50,379.07	Claim No. 30011 alleges unpaid 2024 incentive compensation but provides only plan materials and an unallocated screenshot/email. The claimant has not demonstrated an actual and necessary postpetition benefit or segregated prepetition amounts. The Debtors object and reclassify the claim as general unsecured. (11 U.S.C. § 503(b); D. Del. L.R. 3007-1.)
WBH Wachenhausen Patentanwälte	30004	Administrative Expense Request (patent services)	\$ 6,553.78	GUC	\$ 6,553.78	Claim No. 30004 attaches invoices dated 2023 through September 2024 in euros and lacks an exchange-rate reconciliation to the asserted USD amount. The supporting invoices are prepetition. The Debtors object and reclassify the claim as general unsecured and reserve the right to seek reduction for unsupported currency conversion or duplicate entries. (Fed. R. Bankr. P. 3001(f); D. Del. L.R. 3007-1.)

SCHEDULE 3

Unvested Equity Award Claims

Schedule 3
Unvested Equity Award Claims

Claimant Name	Claim No.	Asserted Claim Class	Asserted Claim Amount	Modified Claim Class	Modified Claim Amount	Reason for Modification
Buckley, Jim	30024	Administrative Expense Request (equity program award)	\$100,000.00	Disallowed	\$0.00	Claim No. 30024 asserts an unvested time-based cash award that vests 25% in 2025, 25% in 2026, and 50% in 2027, conditioned on continued employment. As of the Petition Date, no portion of the award was vested. The Debtors object and seek disallowance of the claim as unmatured, contingent, and forfeitable, and further object to any assertion of administrative priority. (11 U.S.C. §§ 503(b), 507; D. Del. L.R. 3007-1.)
Pappas, Robert J	30015	Administrative Expense Request (equity program award)	\$100,000.00	Disallowed	\$0.00	Claim No. 30015 duplicates the unvested incentive award theory asserted in Claim No. 30024. For the same reasons set forth above, the Debtors object and seek disallowance. (11 U.S.C. §§ 503(b), 507; D. Del. L.R. 3007-1.)
Purcell, Lauren	30013	Administrative Expense Request (equity program award)	\$100,000.00	Disallowed	\$0.00	Claim No. 30013 duplicates the unvested incentive award theory asserted in Claim No. 30024. For the same reasons set forth above, the Debtors object and seek disallowance. (11 U.S.C. §§ 503(b), 507; D. Del. L.R. 3007-1.)
Swiney, Luke	30012	Administrative Expense Request (equity program award)	\$100,000.00	Disallowed	\$0.00	Claim No. 30012 duplicates the unvested incentive award theory asserted in Claim No. 30024. For the same reasons set forth above, the Debtors object and seek disallowance. (11 U.S.C. §§ 503(b), 507; D. Del. L.R. 3007-1.)

SCHEDULE 4

Assumed Contract Claims

Schedule 4
Assumed Contract Claims

Claimant Name	Claim No.	Asserted Claim Class	Asserted Claim Amount	Modified Claim Class	Modified Claim Amount	Reason for Modification
Iron Mountain Information Management LLC	30017	Administrative Expense Request (storage)	\$10,080.89	Partially Disallowed (Assumed/Assigned Contract)	\$246.85	Claim No. 30017 seeks allowance under 11 U.S.C. § 503(b) for postpetition storage and services. The invoice reflects a service period of 10/23/2024–11/25/2024 (pre-closing) and a storage period of 12/01/2024–12/31/2024 (post-closing). The Iron Mountain contract is listed on the Purchaser's Final List of Assigned Contracts as a "Purchased Contract" assumed and assigned at closing (Schedule 2.1(g), item 34). Accordingly, the Debtors allow the \$246.85 service charge attributable to the pre-closing service period and object to and seek disallowance of the other charges attributable to the post-closing period as the Purchaser's obligation.

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' SECOND OMNIBUS (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’ Second Omnibus (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 claim 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 1–4 to the Proposed Order is true and correct to the best of my knowledge, information and belief.

CLAIM OBJECTIONS

A. Reclassified 503(b)(9) Claims

5. The Debtors have reviewed their books and records and determined that the Reclassified 503(b)(9) Claims should be reclassified to general unsecured claims, in whole or in part, as provided for on Schedule 1 to the Proposed Order to prevent claimants from receiving undue administrative priority status to the detriment of other creditors in these chapter 11 cases. Accordingly, the Debtors seek to reclassify the Reclassified 503(b)(9) Claims in the manner set forth on Schedule 1 to the Proposed Order. The facts relevant to the Reclassified 503(b)(9) Claims are as follows:

- **Claim No. 10024 (Hewlett-Packard Financial Services Co.).** The claim improperly asserts priority under section 503(b)(9) for equipment lease obligations. Section 503(b)(9) applies only to the “value of goods received” within 20 days before the Petition Date and does not apply to pure equipment lease payments. The claimant’s schedule identifies \$4,045.84 as pre-petition, with the remaining amounts attributable to post-petition and future rent, which are not allowable as pre-petition claims under section 503(b)(9). The Debtors object and seek reclassification of the pre-petition amounts as a general unsecured claim and disallowance of the remainder balance.
- **Claim No. 10062 (Robert J. Pappas).** The claim improperly asserts priority under section 503(b)(9) for a time-based employee incentive award. Section 503(b)(9) applies solely to goods sold to the debtor in the ordinary course of business and does not extend to contingent or unvested compensation. The

supporting documentation reflects that the \$100,000 award is time-vested and subject to forfeiture, with no portion vested as of the Petition Date. The Debtors object and seek reclassification of the claim as a general unsecured claim.

- **Claim No. 10082 (David West).** The claim improperly asserts priority under section 503(b)(9) for employee expense reimbursements. The claimant has not provided supporting documentation evidencing goods sold to the Debtors. The Debtors object and seek reclassification of the claim as a general unsecured claim, without prejudice to further review of any portion properly supported as a post-petition administrative expense.
- **Claim No. 35 (Richard Whipp).** The claim asserts wages and benefits and also seeks priority under section 503(b)(9). Wages and benefits do not constitute “goods sold” within the meaning of section 503(b)(9). The Debtors object to the section 503(b)(9) characterization and seek to reclassify any properly documented wage claim under section 507(a)(4), to the extent allowable. In the absence of supporting payroll records and evidence of earnings dates, reclassification to general unsecured status is appropriate.

B. Reclassified Administrative Claims

6. The Debtors have reviewed their books and records and determined that the Reclassified Administrative Claims are not entitled to administrative expense priority because they are prepetition in nature or do not constitute actual, necessary costs and expenses of preserving the Debtors’ estates. As a result, the Debtors seek to reclassify the Reclassified Administrative Claims to general unsecured claims, in whole or in part, as provided for on Schedule 2 to the Proposed Order. The facts relevant to the Reclassified Administrative Claims are as follows:

- **Claim No. 30003 (AccuSourceHR, Inc. (Frasco Profiles)).** The claim is asserted as an administrative expense, however, the supporting invoice covers the pre-petition period of June 1, 2024 through July 1, 2024. The claimant has not established entitlement to administrative expense priority under section 503(b). The Debtors object and seek reclassification of the claim as a general unsecured claim.
- **Claim No. 30005 (Jeremy Adams).** The claim relates to a customer refund/RMA request arising from a November 2024 purchase and does not constitute an administrative expense absent contractual or equitable grounds. The Debtors object and seek reclassification of the claim as a general unsecured

claim.

- **Claim No. 30010 (Maria D. Blake).** The claim seeks payment for accrued PTO and vacation but does not include supporting payroll or accrual documentation. The filing does not establish entitlement to post-petition administrative priority. The Debtors object and seek reclassification of the claim as a general unsecured claim; any priority under section 507(a)(4) may be allowed only to the extent properly documented.
- **Claim No. 30027 (Fernando Meza).** The claim relates to a clinician honorarium arising from a pre-petition engagement and does not demonstrate a post-petition benefit to the estate. The Debtors object and seek reclassification of the claim as a general unsecured claim.
- **Claim No. 30007 (Pedro Pantoja).** The claim asserts accrued vacation but attaches only internal human resources correspondence and no payroll ledger or accrual records. The claimant has not demonstrated post-petition accrual or entitlement to administrative priority. The Debtors object and seek reclassification of the claim as a general unsecured claim. Any priority under section 507(a)(4) is allowable only to the extent properly documented.
- **Claim No. 30014 (Stephen E Ross).** The claim seeks reimbursement of employee expenses supported by receipts spanning pre- and post-petition periods but does not allocate amounts to demonstrate an actual and necessary post-petition benefit to the estate. The Debtors object and seek reclassification of the claim as a general unsecured claim.
- **Claim No. 30022 (Scott Sotherden).** The claim amends Claim No. 30009 but does not allocate pre-petition versus post-petition compensation or provide supporting payroll documentation. The Debtors object and seek reclassification of the claim as a general unsecured claim.
- **Claim No. 30023 (Scott Sotherden).** The claim amends Claim No. 30008 and increases the asserted amount but provides no documentation establishing any post-petition administrative entitlement. The Debtors object and seek reclassification of the claim as a general unsecured claim.
- **Claim No. 30011 (Luke Swiney).** The claim alleges unpaid 2024 incentive compensation but provides only bankruptcy plan materials and unallocated supporting documentation. The claimant has not demonstrated an actual and necessary post-petition benefit or segregated pre-petition amounts. The Debtors object and seek reclassification of the claim as a general unsecured claim.
- **Claim No. 30004 (WBH Wachenhausen Patentanwälte).** The claim attaches pre-petition invoices dated 2023 through 2024 denominated in euros and does

not provide an exchange rate reconciliation to the asserted U.S. dollar amount. The Debtors object and seek reclassification of the claim as a general unsecured claim, and reserve the right to seek reduction for unsupported currency conversion or duplicate entries.

C. Unvested Equity Award Claims

7. The Debtors have reviewed their books and records and determined that the Unvested Equity Award Claims are not enforceable against the Debtors because, as of the Petition Date, the amounts asserted were unvested, contingent, or forfeitable. Accordingly, to prevent claimants from potentially receiving an unwarranted recovery, the Debtors seek to disallow and expunge the Unvested Equity Award Claims in the manner set forth on Schedule 3 to the Proposed Order. The facts relevant to the Unvested Equity Award Claims are as follows:

- **Claim No. 30024 (Jim Buckley).** The claim asserts an unvested, time-based cash award scheduled to vest 25% in 2025, 25% in 2026, and 50% in 2027, contingent upon continued employment. As of the Petition Date, no portion of the award had vested. The Debtors object and seek disallowance of the claim as unmaturing, contingent, and subject to forfeiture, and further object to any assertion of administrative expense priority.
- **Claim No. 30015 (Robert J. Pappas).** The claim duplicates the unvested incentive award theory asserted in Claim No. 30024. For the same reasons set forth above, the Debtors object and seek disallowance.
- **Claim No. 30013 (Lauren Purcell).** The claim duplicates the unvested incentive award theory asserted in Claim No. 30024. For the same reasons set forth above, the Debtors object and seek disallowance.
- **Claim No. 30012 (Luke Swiney).** The claim duplicates the unvested incentive award theory asserted in Claim No. 30024. For the same reasons set forth above, the Debtors object and seek disallowance.

D. Assumed Contract Claims

8. The Debtors have reviewed their books and records and determined that the Assumed Contract Claims are not enforceable against the Debtors because the Debtors believe

the applicable agreement was assumed and assigned in connection with the Sale. Accordingly, to prevent the claimant from potentially receiving an unwarranted recovery from the Debtors' estates, the Debtors seek to disallow and expunge the Assumed Contract Claims in the manner set forth on Schedule 4 to the Proposed Order. The facts relevant to the Assumed Contract Claims are as follows:

- **Claim No. 30017 (Iron Mountain Information Management LLC).** The claim seeks allowance of an administrative expense under section 503(b) for post-petition storage and related services. The supporting invoice reflects a pre-closing service period of October 23, 2024 through November 25, 2024 and a post-closing storage period of December 1, 2024 through December 31, 2024. The Iron Mountain agreement appears on the Purchaser's Final List of Assigned Contracts as a "Purchased Contract" assumed and assigned at closing (Schedule 2.1(g), Item 34). Accordingly, the Debtors allow the \$246.85 service charge attributable to the pre-closing service period, and object to, and seek disallowance of, the remaining amounts attributable to the post-closing period as obligations of the Purchaser.

9. 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