

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

|                                                     |                                                                                                                        |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| In re:                                              | Chapter 11                                                                                                             |
| Advanced Bioscience Consumables, Inc., <sup>1</sup> | Case No. 23-10368 (JTD)                                                                                                |
| Reorganized Debtor.                                 | <b>Hearing Date: March 4, 2026 at 10:00 a.m. (ET)</b><br><b>Objection Deadline: February 3, 2026 at 4:00 p.m. (ET)</b> |

**THIRD MOTION OF THE  
LIQUIDATION TRUSTEE FOR ENTRY OF AN ORDER  
EXTENDING THE TIME TO FILE OBJECTIONS TO CLAIMS**

Peter Kravitz, solely in his capacity as the liquidation trustee (the “Liquidation Trustee”) of the SiO2 Liquidation Trust (the “Liquidation Trust”) established pursuant to the *Joint Chapter 11 Plan of Reorganization of SiO2 Medical Products, Inc., and its Debtor Affiliates* [Jointly Administered Docket No. 475] (the “Plan”),<sup>2</sup> in the above-captioned case of the reorganized debtor (the “Reorganized Debtor” and together with the Closing Debtors, the “Debtors”) hereby moves (this “Motion”), pursuant to section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) and rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for entry of an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”) extending the Claims Objection Deadline (defined below) by

<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is: Advanced Bioscience Consumables, Inc. (2510) (“Advanced Bioscience Consumables”). On September 25, 2023, the Court entered a final decree closing the chapter 11 cases of Advanced Bioscience Consumables’ affiliates (collectively, the “Closing Debtors”). The Closing Debtors, along with the last four digits of each Closing Debtor’s federal tax identification number, are SiO2 Medical Products, Inc. (8467); and Advanced Bioscience Labware, Inc. (1229). The Reorganized Debtor’s noticing address is 2550 Riley Street, Auburn, AL 36832.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan.

approximately 180 days to July 27, 2026.<sup>3</sup> In support of this Motion, the Liquidation Trustee respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider the Motion under 28 U.S.C. § 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 under 28 U.S.C. § 157(b) and, 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 Liquidation Trustee consents to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

2. Venue is proper in this District under 28 U.S.C. §§ 1408 and 1409.

3. The statutory basis for the relief requested herein is section 105(a) of the Bankruptcy Code. Such relief also is warranted under Bankruptcy Rule 9006(b)(1).

### **BACKGROUND**

#### **A. The Chapter 11 Cases**

4. On March 29, 2023 (the “Petition Date”), the Debtors commenced voluntary cases under chapter 11 of the Bankruptcy Code in this Court.

5. On July 19, 2023, the Court confirmed the Plan, a copy of which is attached as Exhibit A to the *Findings of Fact, Conclusions of Law, and Order Confirming the Joint Chapter 11 Plan of Reorganization of SiO2 Medical Products, Inc., and its Debtor Affiliates* [Jointly

---

<sup>3</sup> Exactly 180 days from January 26, 2026, falls on Saturday, July 25, 2026. July 27, 2026, is the next date which is not a weekend or holiday.

Administered Docket No. 478] (the “Confirmation Order”). On August 4, 2023, the Debtors filed the *Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Related Bar Dates* [Jointly Administered Docket No. 503] (the “Notice of Effective Date”). Pursuant to the Notice of Effective Date, the Effective Date occurred on August 3, 2023.

6. Pursuant to the Plan and Confirmation Order, the Liquidation Trust is responsible for reconciling Class 5 General Unsecured Claims. See Plan, Art. VII.B; Confirmation Order ¶ 94.

#### **B. The Claims Process**

7. On April 24, 2023, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Form and Manner of Notice Thereof* [Jointly Administered Docket No. 192] (the “Bar Date Order”), which established May 24, 2023, at 11:59 p.m. (ET) as the deadline for all persons and entities, other than governmental units, to file prepetition proofs of claim against the Debtors, including claims pursuant to section 503(b)(9) of the Bankruptcy Code. The Bar Date Order also established September 25, 2023, at 11:59 p.m. (ET) as the deadline for governmental units to file prepetition proofs of claim against the Reorganized Debtors.

8. On April 26, 2023, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (together, the “Schedules and Statements”). See Docket Nos. 217, 218, & 219. Among other things, the Schedules and Statements set forth the claims of known creditors against the Debtors as of the Petition Date, based upon the Debtors’ books and records.

9. The deadline for filing administrative expense claims expired on September 4, 2023. See Jointly Administered Docket Nos. 503 & 508.

10. The Plan set the deadline to file objections to claims as 180 days after the Effective Date (*i.e.*, January 30, 2024) (the “Claims Objection Deadline”). *See* Plan, Art. I.A(28), VII.F.

11. To date, the Claims Objection Deadline has been extended twice by the Debtors (*see* Docket Nos. 46 & 66) and twice by the Liquidating Trustee (*see* Docket Nos. 124 & 142). The current Claims Objection Deadline is January 26, 2026.

### **RELIEF REQUESTED**

12. By this Motion,<sup>4</sup> the Liquidation Trustee requests an extension of the Claims Objection Deadline through and including July 27, 2026 (*i.e.*, approximately 180 days from the current deadline), without prejudice to the right of the Liquidation Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline.

### **BASIS FOR RELIEF**

13. Section 105(a) of the Bankruptcy Code provides, in pertinent part, that the Court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a).

14. Bankruptcy Rule 9006 permits the Court to extend deadlines for cause. Specifically, Bankruptcy Rule 9006 provides, in pertinent part:

[T]he court may—at any time and for cause— extend the time to act if:

(A) with or without a motion or notice, a request to extend is made before the period (or a previously extended period) expires.

Fed. R. Bankr. P. 9006(b)(1).

15. Furthermore, pursuant to the terms of the Plan, the Claims Objection Deadline may be extended upon a motion to the Court.

---

<sup>4</sup> Pursuant to Local Rule 9006-2, the Claims Objection Deadline is automatically extended until the Court acts on this Motion.

16. Since the Effective Date, the Liquidation Trustee, the Reorganized Debtor, and their respective professionals have worked to, among other things, review and analyze the filed proofs of claim and perform the required due diligence to identify any objectionable claims. To date, the Liquidation Trustee has filed an omnibus claim objection [Docket No. 54], which was sustained on July 15, 2024 [Docket No. 59]. However, the Liquidation Trustee needs additional time to fully reconcile the remaining claims, prepare objections thereto, if necessary, and/or consensually resolve such claims, if appropriate. Accordingly, the Liquidation Trustee requests an extension of the Claims Objection Deadline through and including July 27, 2026.

### **NOTICE**

17. Notice of this Motion will be given to: (i) the U.S. Trustee, (ii) the Reorganized Debtor, and (iii) all parties entitled to notice pursuant to Bankruptcy Rule 2002. The Liquidation Trustee submits that, under the circumstances, no other or further notice is required.

### **CONCLUSION**

WHEREFORE, the Liquidation Trustee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, approving the Motion and granting such other and further relief as the Court deems appropriate under the circumstances.

Dated: January 20, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Katelin A. Morales

Aaron H. Stulman (No. 5807)

Katelin A. Morales (No. 6683)

Andrew C. Ehrmann (No. 7395)

**POTTER ANDERSON & CORROON LLP**

1313 N. Market Street, 6<sup>th</sup> Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Email: astulman@potteranderson.com

kmorales@potteranderson.com

aehrmann@potteranderson.com

*Counsel for the Liquidation Trustee*

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

In re:

Advanced Bioscience Consumables, Inc.,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 23-10368 (JTD)

**Hearing Date: March 4, 2026 at 10:00 a.m. (ET)**

**Objection Deadline: February 3, 2026 at 4:00 p.m. (ET)**

**NOTICE OF THIRD MOTION OF THE LIQUIDATION TRUSTEE FOR ENTRY  
OF AN ORDER EXTENDING THE TIME TO FILE OBJECTIONS TO CLAIMS**

**PLEASE TAKE NOTICE** Peter Kravitz, solely in his capacity as the Liquidation Trustee of the SiO2 Liquidation Trust established in the above-captioned chapter 11 case (the “Liquidation Trustee”), filed the *Third Motion of the Liquidation Trustee for Entry of an Order Extending the Time to File Objections to Claims* (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that objections to the Motion, if any, must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3<sup>rd</sup> Floor, 824 N. Market Street, Wilmington, Delaware 19801, and served upon and received by the undersigned counsel on or before **February 3, 2026 at 4:00 p.m. (ET)** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable John T. Dorsey, United States Bankruptcy Judge, at the Court, 824 N. Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801 on **March 4, 2026 at 10:00 a.m. (ET)**.

---

<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is: Advanced Bioscience Consumables, Inc. (2510) (“Advanced Bioscience Consumables”). On September 25, 2023, the Court entered a final decree closing the chapter 11 cases of Advanced Bioscience Consumables’ affiliates (collectively, the “Closing Debtors”). The Closing Debtors, along with the last four digits of each Closing Debtor’s federal tax identification number, are SiO2 Medical Products, Inc. (8467); and Advanced Bioscience Labware, Inc. (1229). The Reorganized Debtor’s noticing address is 2550 Riley Street, Auburn, AL 36832.

**IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: January 20, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Katelin A. Morales

Aaron H. Stulman (No. 5807)

Katelin A. Morales (No. 6683)

Andrew C. Ehrmann (No. 7395)

**POTTER ANDERSON & CORROON LLP**

1313 N. Market Street, 6<sup>th</sup> Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: astulman@potteranderson.com

kmorales@potteranderson.com

aehrmann@potteranderson.com

*Counsel for the Liquidation Trustee*

**EXHIBIT A**

**Proposed Order**

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

In re:

Advanced Bioscience Consumables, Inc.,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 23-10368 (JTD)

Re: Docket No. \_\_\_\_

**ORDER EXTENDING THE TIME TO FILE OBJECTIONS TO CLAIMS**

Upon consideration of the motion (the “Motion”)<sup>2</sup> of the Liquidation Trustee for entry of an order pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9006(b)(1) extending the Claims Objection Deadline; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the relief requested being in the best interest of the Reorganized Debtor, its estate, and all other parties in interest; and after due deliberation thereon and good and sufficient cause appearing therefor, it is hereby

**ORDERED, ADJUDGED, AND DECREED THAT:**

---

<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is: Advanced Bioscience Consumables, Inc. (2510) (“Advanced Bioscience Consumables”). On September 25, 2023, the Court entered a final decree closing the chapter 11 cases of Advanced Bioscience Consumables’ affiliates (collectively, the “Closing Debtors”). The Closing Debtors, along with the last four digits of each Closing Debtor’s federal tax identification number, are SiO2 Medical Products, Inc. (8467); and Advanced Bioscience Labware, Inc. (1229). The Reorganized Debtor’s noticing address is 2550 Riley Street, Auburn, AL 36832.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

1. The Motion is granted to the extent set forth herein.
2. The Claims Objection Deadline is hereby extended through and including July 27, 2026, without prejudice to the right of the Liquidation Trustee or any other party in interest to seek further extensions of the Claims Objection Deadline.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the interpretation, implementation, or enforcement of this Order.