

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

)	
In re:)	Chapter 11
)	
MALLINCKRODT PLC, <i>et al.</i> ,)	Case No. 20-12522 (JTD)
)	
Debtors. ¹)	(Jointly Administered)
)	
)	Obj. Deadline: May 18, 2021 at 4:00 p.m. (ET)
)	Hearing Date: May 26, 2021 at 1:00 p.m. (ET)

**NOTICE OF HEARING TO CONSIDER APPROVAL
OF DISCLOSURE STATEMENT FOR JOINT PLAN
OF REORGANIZATION OF MALLINCKRODT PLC AND ITS
DEBTOR AFFILIATES UNDER CHAPTER 11 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE THAT on April 20, 2021, the debtors and debtors in possession in the above-captioned cases (collectively, the “*Debtors*”) filed the *Joint Plan of Reorganization of Mallinckrodt plc and Its Debtor Affiliates under Chapter 11 of the Bankruptcy Code* [Docket No. 2074] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “*Plan*”)² and the proposed *Disclosure Statement for Joint Chapter 11 Plan of Reorganization of Mallinckrodt plc and Its Debtor Affiliates under Chapter 11 of the Bankruptcy Code* [Docket No. 2075] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “*Disclosure Statement*”) with the United States Bankruptcy Court for the District of Delaware (the “*Bankruptcy Court*”).

PLEASE TAKE FURTHER NOTICE THAT:

1. The Bankruptcy Court has scheduled a hearing for **May 26, 2021 at 1:00 p.m. (prevailing Eastern Time)** (the “*Disclosure Statement Hearing*”) to determine whether to, among other things, approve the Disclosure Statement as containing “adequate information” within the meaning ascribed to such term in section 1125 of title 11 of the United States Code, 11 U.S.C. § 101-1532 (the “*Bankruptcy Code*”).

2. The Disclosure Statement Hearing will be held before the Honorable John T. Dorsey, United States Bankruptcy Judge, at the Bankruptcy Court, located at 824 North Market

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://restructuring.primeclerk.com/Mallinckrodt>. The Debtors’ mailing address is 675 McDonnell Blvd., Hazelwood, Missouri 63042.

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

Street, Fifth Floor, Courtroom No. 5, Wilmington, Delaware 19801.³ The Disclosure Statement Hearing may be continued from time to time without further notice other than the announcement of the adjourned date(s) at the Disclosure Statement Hearing or any continued hearing or as indicated in any notice of agenda of matters scheduled for hearing filed with the Bankruptcy Court. If the Disclosure Statement Hearing is continued, the Debtors will post the new date and time of the Disclosure Statement Hearing at <https://restructuring.primeclerk.com/Mallinckrodt/>. The Disclosure Statement and Plan may be modified, if necessary, in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and other applicable law, before, during, or as a result of the Disclosure Statement Hearing, without further notice to creditors or other parties in interest.

3. Copies of the Disclosure Statement and Plan are available for review free-of-charge on the website maintained by the Debtors' claims, noticing, and solicitation agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/Mallinckrodt/>. Copies of the Disclosure Statement and Plan are also available upon request by contacting the Prime Clerk LLC at MallinckrodtInfo@primeclerk.com or at (877) 467-1570 (Toll-Free) or (347) 817-4093 (International).

4. Responses and objections, if any, to approval of the Disclosure Statement or the other relief sought by the Debtors in connection with the approval of the Disclosure Statement, must: (a) be in writing; (b) state the name and address of the objecting party and the nature of the Claim or Equity Interest held by such party; (c) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be inserted in the Disclosure Statement to resolve any such objection or response; and (d) be filed, together with proof of service, with the Bankruptcy Court and served so as to be actually received on or before **May 18, 2021 at 4:00 p.m. (prevailing Eastern Time)** by:

- a. counsel to the Debtors, (i) Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Attn: George Davis (George.Davis@lw.com), George Klidonas (George.Klidonas@lw.com), Anupama Yerramalli (Anu.Yerramalli@lw.com), and Andrew Sorkin (Andrew.Sorkin@lw.com)), Latham & Watkins LLP, 355 South Grand Avenue, Suite 100, Los Angeles, California 90071 (Attn: Jeffrey Bjork (Jeff.Bjork@lw.com)), and 330 North Wabash Avenue, Suite 2800, Chicago, Illinois 60611 (Attn: Jason Gott (Jason.Gott@lw.com)) and (ii) Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, Delaware 19801 (Attn: Mark D. Collins (collins@rlf.com) and Michael J. Merchant (merchant@rlf.com));
- b. counsel for the ad hoc group of holders of the Debtors' unsecured notes, (i) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the

³ Pursuant to the direction of the Bankruptcy Court relating to the conduct of hearings due to the Coronavirus Disease 2019 (COVID-19), all hearings are currently being conducted entirely over Zoom pending further instruction from the Bankruptcy Court. Prior to the Disclosure Statement Hearing, the Debtors will file a hearing agenda providing parties with information regarding the format of the Disclosure Statement Hearing and, if necessary, registration information regarding the same.

Americas, New York, New York 10019 (Attn: Andrew N. Rosenberg (arosenberg@paulweiss.com), Alice Belisle Eaton (aeaton@paulweiss.com), Claudia R. Tobler (ctobler@paulweiss.com), and Neal Paul Donnelly (ndonnelly@paulweiss.com)) and (ii) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801 (Attn: Richard S. Cobb (cobb@lrclaw.com));

- c. counsel to the ad hoc committee of governmental entities holding opioid claims, (i) Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Daniel M. Eggermann (deggermann@kramerlevin.com) and Megan Wasson (mwasson@kramerlevin.com)) and (ii) Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, Delaware 19801 (Attn: Jeffrey Waxman (jwaxman@morrisjames.com));
- d. counsel to the administrative agent under the Debtors' existing credit agreement, (i) White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020 (Attn: Michele J. Meises (michele.meises@whitecase.com)) and (ii) Fox Rothschild LLP, 919 N. Market St., Suite 300, P.O. Box 2323, Wilmington, Delaware 19899 (Attn: Jeffrey M. Schlerf (jschlerf@foxrothschild.com));
- e. counsel to the Future Claimants' Representative, Young Conaway Stargatt & Taylor, LLP, 1000 North King Street, Wilmington, Delaware 19801 (Attn: James L. Patton, Jr. (jpatton@ycst.com));
- f. counsel to the official committee of unsecured creditors (i) Cooley LLP, 55 Hudson Yards, New York, New York 10001 (Attn: Cathy Herschopf (cherschopf@cooley.com)), Cooley LLP, 1299 Pennsylvania Avenue, NW, Suite 700, Washington, D.C. 20004 (Attn: Cullen D. Speckhart (cspeckhart@cooley.com)), and (ii) Robinson & Cole LLP, 1201 N. Market Street, Suite 1406, Wilmington, Delaware 19801 (Attn: Natalie D. Ramsey (nramsey@rc.com) and Jamie L. Edmonson (jedmonson@rc.com));
- g. counsel to the official committee of opioid claimants (i) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, New York 10036 (Attn: Arik Preis (apreis@akingump.com), Mitchell P. Hurley (mhurley@akingump.com) and Sara L. Brauner (sbrauner@akingump.com)), and (ii) Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801 (Attn: Justin R. Alberto (jalberto@coleschotz.com) and Seth Van Aalten (svanaalten@coleschotz.com));
- h. counsel to the First Lien Term Lenders (i) Gibson, Dunn & Crutcher LLP, (a) 200 Park Avenue, New York, New York 10166 (Attn: Scott J. Greenberg (sgreenberg@gibsondunn.com) and Michael J. Cohen (mcohen@gibsondunn.com)); and (b) 3161 Michelson Drive, Irvine,

California 93612 (Attn: Oscar Garza (ogarza@gibsondunn.com)); and (ii) Troutman Pepper Hamilton Sanders LLP, Hercules Plaza, Suite 5100, 1313 N. Market Street, Wilmington, Delaware 19899 (Attn: David M. Fournier (david.fournier@troutman.com) and Kenneth A. Listwak (ken.listwak@troutman.com)); and

- i. the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware 19801 (Attn: Jane M. Leamy (Jane.M.Leamy@usdoj.gov)).

5. IF ANY OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE HEARING.

6. THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE COURT.

Dated: April 20, 2021

/s/ Amanda R. Steele

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