

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Sorrento Therapeutics, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-90085 (CML)

(Jointly Administered)

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
AMENDED THIRD MOTION TO EXTEND THE APPLICATION OF THE
AUTOMATIC STAY TO CONTINUE THE RESTRICTED TRADING PERIOD FOR
SHARES OF SCILEX STOCK DISTRIBUTED TO THE DEBTORS' SHAREHOLDERS**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

The Official Committee of Unsecured Creditors (the "Creditors' Committee") of the above-captioned debtors and debtors in possession (collectively, the "Debtors") respectfully state the following in support of this motion (the "Motion"):

RELIEF REQUESTED

1. This Motion seeks to further extend the application of the automatic stay to continue, until September 30, 2024, the restricted trading period (the "Restricted Trading

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Sorrento Therapeutics, Inc. ("Sorrento") (4842) and Scintilla Pharmaceuticals, Inc. (7956). The Debtors' service address is: 4955 Directors Place, San Diego, CA 92121.

Period”) of those Scilex Holding Company (“Scilex”) common shares formerly owned by Sorrento and distributed by Sorrento to its shareholders shortly before the commencement of these bankruptcy cases (the “Distributed Stock”).²

2. This relief is necessary, limited, will preserve value, and will cause no harm. This further extension will preserve the value of a significant cause of action (the “Stock Clawback Claims”) while enabling the estates to marshal their limited resources towards maximizing the estates’ recovery. The Creditors’ Committee has developed a protocol to settle and resolve certain of the Stock Clawback Claims (the “Settlement Protocol”), which it has previewed with the Debtors and the Equity Committee, and intends to present this Settlement Protocol to the Court for approval. Before it does so, however, another party in interest—the buyer in the proposed Sale³—has requested that the approval of the Settlement Protocol be delayed for a short period. Extending the Restricted Trading Period will enable the estates to honor this request and, following that brief delay, to permit the Creditors’ Committee or, if the Plan’s effective date has passed, the Liquidating Trust to commence the procedures contemplated under the Settlement Protocol to settle certain Stock Clawback Claims in an orderly fashion before the Distributed Stock is widely traded.

² On April 25, 2023, the Court entered the *Order Extending the Application of the Automatic Stay to Continue the Restricted Trading Period for Shares of Scilex Stock Distributed to the Debtors’ Shareholders* [Docket No. 524] (the “Initial Extension Order”). On August 24, 2023, the Court entered the *Order Extending the Application of the Automatic Stay to Continue the Restricted Trading Period for Shares of Scilex Stock Distributed to the Debtors’ Shareholders* [Docket No. 1237] (the “Second Extension Order”), which further extended the Restricted Trading Period to December 1, 2023. On September 12, 2023, the Court granted the *Order (I) Approving Sale of Scilex Stock to Scilex Holdings Company Free and Clear of All Liens, Claims, Interest, and Encumbrances, (II) Conditionally Vacating the Oramed Sale Order, and (III) Granting Related Relief* [Docket No. 1316] (the “Scilex Sale Order”), which further extended the Restricted Trading Period to March 31, 2024.

³ See *Debtors’ Emergency Motion For Entry of Orders Approving (I) Senior Secured Superpriority Financing and (II)(A) Sale of Assets and (B) Modifications to Chapter 11 Plan* [Docket No. 1884] (the “Sale Motion,” which seeks approval of the “Sale”).

3. Little, if any, harm would result from this further extension. Sorrento equity holders received the Distributed Stock without providing any consideration for such stock. The Distributed Stock has never traded. As the holders of such stock received it as a gratuity, they will not be harmed by the continuation of the Restricted Trading Period. The Motion seeks only to extend the *status quo* for a further time.

4. The Creditors' Committee understands that the Debtors do not oppose the relief requested herein. For the reasons noted above and discussed fully herein, the Creditors' Committee requests that the Court grant the Motion extending the application of the automatic stay to continue the Restricted Trading Period for the Distributed Stock through September 30, 2024.

JURISDICTION AND VENUE

5. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief sought herein are 11 U.S.C. §§ 105(a) and 362.

BACKGROUND

A. Prior Extensions of the Restricted Trading Period

6. The Creditors' Committee previously sought extensions of the Restricted Trading Period to permit the Debtors to focus on developing the Modified Joint Plan of Liquidation (the "Plan") and, thereafter, monetizing its assets in order for the Plan to go effective.

7. Specifically, on April 24, 2023, the Creditors' Committee filed the *Emergency Motion to Extend the Application of the Automatic Stay to Continue the Restricted Trading Period for Shares of Scilex Stock Distributed to the Debtors' Shareholders* [Docket No. 518] (the

“Initial Extension Motion”)⁴ seeking extension of the Restricted Trading Period through September 1, 2023. The next day, the Court entered the Initial Extension Order, granting the relief requested.

8. On August 16, 2023, the Creditors’ Committee filed its *Second Emergency Motion to Extend the Application of the Automatic Stay to Continue the Restricted Trading Period for Shares of Scilex Stock Distributed to the Debtors’ Shareholders* [Docket No. 1216] seeking extension of the Restricted Trading Period through December 1, 2023. The Court entered the Second Extension Order on August 24, 2023, granting the relief requested. As noted in footnote 2, the Court entered the Scilex Sale Order on September 12, 2023, further extending the Restricted Trading Period to March 31, 2024.

9. The factual background of the Distribution in which the Distributed Stock was provided to Sorrento equity holders is set forth in the Initial Extension Motion.

B. The Distributed Stock Continues to Be Held at Brokerages

10. As of the date of this Motion, the Creditors’ Committee believes that the Distributed Stock continues to be held by the Sorrento shareholders of record as of the date of the Distribution. Trading in the Distributed Stock continues to be restricted through the end of the current Restricted Trading Period, March 31, 2024.

C. Rationale for the Further Extension of the Restricted Trading Period

11. Previous extensions of the Restricted Trading Period were sought to ensure that the Stock Clawback Claims could be pursued when the estates, having monetized their other assets, had sufficient resources with which to fund the prosecution of such claims. The Creditors’ Committee agreed with the Debtors’ recommendation that the parties should focus on

⁴ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Initial Extension Motion.

maximizing recoveries for the Debtors' estates and unsecured creditors through the chapter 11 process prior to pivoting to seeking recoveries through litigation. And that is how the parties proceeded.

12. Since confirmation of the Plan, the Creditors' Committee has considered various proposals to sell Debtors' assets, including by entertaining several concepts proposed by the Equity Committee on how best to proceed. The Stock Clawback Claims were necessarily a part of those discussions.

13. Recently, the Debtors and the Creditors' Committee agreed to sell most of the estates' assets aside from the Stock Clawback Claims and certain other claims, subject to obtaining a Court order. While this proposed Sale was being negotiated, the Creditors' Committee developed the Settlement Protocol, pursuant to which potential defendants could settle the Stock Clawback Claims, and prepared to file a motion to approve the same. The Creditors' Committee shared a draft of the Settlement Protocol with both the Debtors and the Equity Committee.

14. However, the proposed buyer in the Sale asked that the Creditors' Committee not seek approval of the Settlement Protocol for two months from consummation of the proposed Sale, and seek to extend the Restricted Trading Period further to account both for the brief delay and the time necessary to implement the Settlement Protocol's procedures. The Creditors' Committee was amenable to such request.

15. At the present time, it is crucial that the Debtors and the Creditors' Committee cooperate on efforts to monetize the estates' assets, including consummating the proposed Sale and having the Plan go effective. Once the two-month period requested by the buyer expires, the Creditors' Committee or the Liquidating Trust (depending on the Plan's effective date) would

then seek Court authority to commence the procedures contemplated in the Settlement Protocol and proceed with offers to settle the Stock Clawback Claims in an orderly fashion.⁵

BASIS FOR RELIEF

16. Section 362 imposes a broad injunction prohibiting, among other things, “any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate.” 11 U.S.C. § 362(a)(3). “The purposes of the bankruptcy stay under 11 U.S.C. § 362 ‘are to protect the debtor’s assets, provide temporary relief from creditors, and further equity of distribution among the creditors by forestalling a race to the courthouse.’”⁶

17. Courts frequently grant relief under section 362 that places certain restrictions on trading in equity securities of a debtor in order to preserve the value of that debtor’s tax attributes.⁷ The relief sought here is of a similar nature. Like tax attributes, litigation claims are property of the estate under 11 U.S.C. § 541.⁸ As do motions to preserve the value of tax attributes, the Motion seeks to extend the automatic stay’s protection to preserve the estates’

⁵ As will be set forth more fully in the motion to approve the Settlement Protocol to be filed in due course, the offers to settle the Stock Clawback Claims provided through the Settlement Protocol are proposed to remain open for a certain period of time. Following the close of that period, the Liquidating Trust would commence litigation of the Stock Clawback Claims with respect to holders of the Distributed Stock that decline the settlement offers.

⁶ *Reliant Energy Servs., Inc. v. Enron Canada Corp.*, 349 F.3d 816, 825 (5th Cir. 2003) (quoting *GATX Aircraft Corp. v. M/V Courtney Leigh*, 768 F.2d 711, 716 (5th Cir. 1985)).

⁷ See, e.g., *Order Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with respect to Common Stock* [Docket No. 110]; *In re Nielsen & Bainbridge, LLC*, Case No. 23-90071 (DRJ) (Bankr. S.D. Tex.), *Final Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief* [Docket No. 59]; *In re Basic Energy Services, Inc.*, Case No. 21-90002 (DRJ) (Bankr. S.D. Tex.) *Order (I) Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in Debtors and (B) Certain Worthless Stock Deduction Claims; and (II) Granting Related Relief* [Docket No. 82]; *In re Pharmor, Inc.*, 152 B.R. 924, 927 (Bankr. N.D. Ohio 1993).

⁸ See, e.g., *In re MortgageAmerica Corp.*, 714 F.2d 1266, 1274 (5th Cir. 1983) (property of the estate under section 541 includes “rights of action” that may be “based on either federal or state law”); *Matter of S.I. Acquisition, Inc.*, 817 F.2d 1142, 1149 (5th Cir. 1987) (“the term ‘all legal and equitable interests of the debtor in property’ [from section 541] is all-encompassing and includes rights of action as bestowed by either federal or state law”).

ability to exercise control over, and to realize value from, estate assets—here, by preserving the *status quo* with respect to existing trading restrictions, rather than imposing new ones.

18. Sections 105 and 362 of the Bankruptcy Code grant courts the discretion to extend the automatic stay to non-debtors.⁹ Courts have found cause to extend the automatic stay to protect against “an immediate adverse economic consequence for the debtor’s estate”¹⁰ or upon a finding of “unusual circumstances,”¹¹ including matters that “impact the Debtors’ ability to engage in timely and effective reorganization.”¹²

19. Temporarily extending the application of the automatic stay to continue the Restricted Trading Period for the Distributed Stock to preserve the estates’ ability to exercise control over (and preserve the value of) the Stock Clawback Claims is warranted in the unusual circumstances here and is necessary to avoid adverse consequences that would impair the estates’ ability to recover on those valuable claims. At the same time, those affected by the extension of the stay would not be harmed by such extension because they provided no consideration for the Distributed Stock.

⁹ See, e.g., *A.H. Robins Co. v. Piccinin*, 788 F.2d 994, 999 (4th Cir. 1986); *In re QA3 Financial Corp.*, 2011 WL 2678591, at *1 (Bankr. D. Neb. July 7, 2011) (recognizing the “application of 362(a)(3) to extend the automatic stay to a non-debtor is justified” when action against non-debtors “would inevitably have an adverse impact on property of the estate”); *In re Great Atlantic & Pacific Tea Company*, Case No. 15-23007 (RDD) (Bankr. S.D.N.Y. 2015), *Order Pursuant to 11 U.S.C. §§ 105(a) and 362(a) Extending the Automatic Stay to Certain Non-Debtor Parties and Approving Procedures for the Modification of the Automatic Stay Under Certain Circumstances* [Docket No. 1565] (extending automatic stay under sections 362 and 105 to certain non-debtor parties in connection with certain prepetition personal injury lawsuits and other actions).

¹⁰ *Queenie, Ltd. v. Nygard Int’l*, 321 F.3d 282, 287 (2d Cir. 2003) (extending the automatic stay to the wholly owned subsidiary of a debtor where the “adjudication of a claim against the [non-debtor] corporation will have an immediate adverse economic impact on” the debtor).

¹¹ *In re QA3 Financial Corp.*, 2011 WL 2678591, at *1 (“unusual circumstances”—there, an identity between a debtor and a third-party defendant—justified extension of application of automatic stay to non-debtors).

¹² *In re Philadelphia Newspapers, LLC*, 407 B.R. 606, 616 (E.D. Pa. 2009) (“unusual circumstances” justified extending the automatic stay to actions against certain non-debtors where, among other things, “the diversion of resources caused by the state action against the Non-Debtors will impact the Debtors’ ability to engage in timely and effective reorganization”).

A. The Stock Clawback Claims Are Valuable Assets of the Estates

20. The Stock Clawback Claims are based on the following: in January 2023, Sorrento distributed 76 million shares of Scilex common stock (held by Sorrento at the time) to Sorrento shareholders. Shareholders provided no consideration for such distribution. As a dividend or return of capital, not given in exchange for any consideration, the transfer of the Distributed Stock to Sorrento's shareholders was *per se* not made for reasonably equivalent value.¹³ Further, Sorrento's liquidity position at the time the Distribution was made raises questions regarding Sorrento's solvency.¹⁴ The Stock Clawback Claims to avoid the Distribution as a fraudulent transfer (among other applicable claims¹⁵) and to recover the Distributed Stock must thus be considered a valuable potential litigation asset of the estates.

21. The estates therefore have a substantial interest in preserving their ability to exercise control over the Stock Clawback Claims by ensuring the estates are able to realize the value of the Stock Clawback Claims, including by implementing the Settlement Protocol the Creditors' Committee has developed. The proceeds of the Stock Clawback Claims remain a large potential source of recovery for the estates and, therefore, were excluded from the assets that are to be sold pursuant to the proposed Sale.¹⁶

¹³ See, e.g., *Michaelson v. Farmer (In re Appleseed's Intermediate Holdings, LLC)*, 470 B.R. 289, 302 (Bankr. D. Del. 2012) (a dividend transaction is "not an exchange, but a one-way payment"); *Alexander v. Albright (In re Terry Mfg. Co., Inc.)*, 2007 WL 274319, at *4 (Bankr. M.D. Ala. 2007) ("Strictly speaking, dividends are not paid in exchange for anything Where, as it is alleged here, an insolvent corporation nevertheless continues to pay dividends, those payments are made for no value to the corporation and such payments are necessarily fraudulent conveyances.").

¹⁴ See 11 U.S.C. § 548(a)(1)(B)(ii) (insolvency for purposes of constructive fraudulent transfer may be established, *inter alia*, if the debtor had unreasonably small capital with which to conduct its business).

¹⁵ Other potentially applicable claims include, without limitation, unlawful or illegal dividends.

¹⁶ See Docket No. 1926, Exhibit 3 (Sale Term Sheet).

B. Unless the Restricted Trading Period Is Continued, the Distributed Stock Will Become Publicly Tradable, Jeopardizing the Ability to Recover the Distributed Stock

22. The estates' ability to recover the Distributed Stock—representing over half of the outstanding common shares of Scilex—has become a critical component of recoveries in these cases. The Distributed Stock is currently restricted from trading publicly through the end of the Restricted Trading Period (March 31, 2024). Owing to this restriction, the record holders of Sorrento shares as of the Record Date still hold the Distributed Stock.

23. Implementing the Settlement Protocol to enable the orderly settlement and resolution of the Stock Clawback Claims will be most efficient during the Restricted Trading Period. As the record holders of Sorrento stock as of the Record Date continue to hold the Distributed Stock, the estates can easily identify the parties that should receive notice of and the ability to participate in the Settlement Protocol (those same record holders).

24. If the Restricted Trading Period for the Distributed Stock expires, however, identifying the parties with whom the estates must deal in terms of settlement or litigation becomes significantly more difficult as a practical matter. The Distributed Stock would trade freely, making identification of the owners of the Distributed Stock much more difficult. Furthermore, subsequent purchasers of the Distributed Stock may have various defenses to the Stock Clawback Claim that could hinder successful recovery of such stock.¹⁷

25. Continuing the Restricted Trading Period for the Distributed Stock would avoid these harms and permit the Creditors' Committee or Liquidating Trust to launch the Settlement Protocol efficiently, realizing value from the Stock Dividend Claims in a cost-effective manner.

¹⁷ See, e.g., 11 U.S.C. § 550(b).

26. In these unusual circumstances, to avoid these harms to the estates, the Court need only maintain the *status quo*. Ensuring the Distributed Stock remains with the record holders of Sorrento shares as of the Record Date will significantly increase the likelihood that the value of the Stock Dividend Claims is realized.¹⁸

C. The Relief Sought Will Not Unduly Prejudice Any Party

27. The relief the Creditors' Committee seeks herein will not cause undue prejudice to any party.

28. The recipients of the Distribution received the Distributed Stock as a gratuity. Sorrento's shareholders have no rights to receive dividends or distributions, as Sorrento made clear to its shareholders when first announcing it was exploring making such a dividend.¹⁹ Moreover, the Distributed Stock has never traded. The holders of the Distributed Stock are not harmed by a further extension of a trading restriction on a stock they had no right to receive and that may in fact be avoidable.

29. Nor will the estates be harmed. Indeed, the Creditors' Committee believes that the relief sought in the instant Motion—preservation of an estate claim—will enable the Debtors to seek approval of the Settlement Protocol in two months, as requested by the proposed buyer in the Sale, and to implement the procedures contemplated in that Settlement Protocol. Far from harming any party, that relief would enable efficient resolution of estate claims, providing value to the estates and providing certainty and finality to holders of the Distributed Stock.

¹⁸ Certain information was already provided by Brokerages pursuant to the *Order Granting Debtors' Rule 2004 Motion* [Docket No. 334.]

¹⁹ See Current Report (SEC Form 8-K), Sorrento Therapeutics, Inc. (Nov. 18, 2022) at 1.

NOTICE

30. The Creditors' Committee will provide notice of this Motion to the following parties or their respective counsel: (a) the U.S. Trustee; (b) the Equity Committee; (c) JMB Capital Partners Lending, LLC; (d) Oramed Pharmaceuticals, Inc.; (e) Scilex Holding Company; (f) the Securities and Exchange Commission; (g) FINRA; (h) NASDAQ; (i) Continental Stock Transfer & Trust Company; (j) the Brokerages and all known record holders; and (k) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

The Creditors' Committee requests that the Court enter the Proposed Order granting the relief requested in this Motion and such other and further relief as is appropriate under the circumstances.

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Dated: March 1, 2024

Respectfully submitted,

By: /s/ Ryan Manns

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*Counsel to the Official Committee of
Unsecured Creditors*

CERTIFICATE OF SERVICE

I, Ryan Manns, hereby certify that on the 1st day of March, 2024 a copy of the foregoing pleading was served via Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

By: /s/ Ryan Manns
Ryan Manns

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Sorrento Therapeutics, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-90085 (CML)

(Jointly Administered)

**ORDER EXTENDING THE APPLICATION OF
THE AUTOMATIC STAY TO CONTINUE THE
RESTRICTED TRADING PERIOD FOR SHARES OF SCILEX
STOCK DISTRIBUTED TO THE DEBTORS' SHAREHOLDERS**
[Relates to Dkt. No. ____]

Upon the motion (the "Motion")² of the Official Committee of Unsecured Creditors (the "Creditors' Committee") of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") further extending the application of the automatic stay to continue the restricted trading period for the common shares of Scilex Holding Company ("Scilex") previously held by Sorrento and distributed to the Debtors' shareholders (the "Distributed Stock") in a distribution on or about January 19, 2023 (the "Distribution"), all as more fully set forth in this Motion and the Initial Extension Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Sorrento Therapeutics, Inc. ("Sorrento") (4842) and Scintilla Pharmaceuticals, Inc. (7956). The Debtors' service address is: 4955 Directors Place, San Diego, CA 92121.

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

Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court, if any; and this Court having determined that the legal and factual bases set forth in support of the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is ORDERED THAT:

1. Pursuant to section 362 of the Bankruptcy Code, the application of the automatic stay is extended to continue the Restricted Trading Period for the Distributed Stock until the earlier of September 30, 2024, or the date on which the Debtors and the Creditors' Committee agree in writing or on the record in these chapter 11 cases that the Stock Clawback Claim to avoid the Distribution should not be pursued, or on such date that this Court deems just and proper. The Court has made no determination on the merits of the Stock Clawback Claim and this Order shall not be construed as such.

2. Pursuant to section 362 of the Bankruptcy Code, the automatic stay is hereby extended to continue to the Restricted Trading Period solely with respect to the Distributed Stock.

3. Pursuant to section 105(a) of the Bankruptcy Code, absent relief from the automatic stay or an order of this Court confirming that the automatic stay does not apply, the Brokerages and any holders of the Distributed Stock are prohibited from selling, trading, or otherwise disposing of the Distributed Stock, or causing or encouraging any third party to do any of the foregoing.

4. Notice of the Motion shall be deemed good and sufficient notice. For the avoidance of doubt, notice of the Motion to the Brokerages and all known record holders shall be deemed good and sufficient notice and no other notice need be provided.

5. Other than to the extent that this Order expressly restricts trading in the Distributed Stock, nothing in this Order or in the Motion shall, or shall be deemed to, prejudice, impair, or otherwise alter or affect the rights of any holders of the Distributed Stock or of common or preferred stock in Scilex, including in connection with the treatment of any such stock under any applicable bankruptcy court order.

6. The Debtors are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

7. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2024

CHRISTOPHER LOPEZ
UNITED STATES BANKRUPTCY JUDGE