



**Third Report of
KSV Restructuring Inc. as
Information Officer of
Paladin Labs Canadian Holding Inc. and
Paladin Labs Inc.**

April 20, 2023

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COURT FILE NO.: CV-22-00685631-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF PALADIN LABS CANADIAN HOLDING INC. AND
PALADIN LABS INC.

APPLICATION OF PALADIN LABS INC. UNDER SECTION 46 OF THE *COMPANIES'*
CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

THIRD REPORT OF KSV RESTRUCTURING INC.
AS INFORMATION OFFICER

APRIL 20, 2023

1.0 Introduction

1. On August 16, 2022 (the "Petition Date"), Endo International plc. ("Endo Parent") and certain of its affiliates (collectively, the "Debtors", and together with their non-debtor affiliates, "Endo" or the "Company"), including Paladin Labs Inc. ("Paladin") and Paladin Labs Canadian Holding Inc. ("Paladin Holding" and jointly with Paladin, the "Canadian Debtors"), commenced proceedings (the "Chapter 11 Proceedings") by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "US Court").
2. On August 17, 2022, the Debtors filed several first day motions in the Chapter 11 Proceedings (collectively, the "First Day Motions"). On August 18, 2022, the US Court granted multiple orders in respect of the First Day Motions (collectively, the "First Day Orders"), including, among others, the:¹
 - a) Foreign Representative Order, which authorized Paladin to act as the foreign representative of the Debtors (the "Foreign Representative");
 - b) Joint Administration Order;
 - c) Notice of Stay Order;
 - d) Interim Wages Order;

¹ Each as defined in the First Supplemental Order (as defined below).

- e) Interim Customer Programs Order;
 - f) Interim Vendor Order;
 - g) Interim Taxes Order;
 - h) Interim Insurance Order;
 - i) Interim Cash Management Order; and
 - j) Interim Cash Collateral Order.
3. In its capacity as Foreign Representative, Paladin brought an application (the “Recognition Application”) before the Ontario Superior Court of Justice (Commercial List) (this “Court”) for recognition of the Chapter 11 Proceedings under Part IV of *the Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the “CCAA”). In connection with the Recognition Application, this Court granted the following orders:
- a) an [Interim Order](#)² (Foreign Proceeding) dated August 17, 2022 (the “Interim Order”), among other things, granting a stay of proceedings in respect of the Canadian Debtors, the property and business of the Canadian Debtors, any subsidiary, affiliate or related party of Endo Parent or any Canadian Debtor that is a defendant in Canadian litigation proceedings or subject to any other proceedings in Canada (the “Canadian Litigation Defendants”), and the directors and officers of the Canadian Debtors and the Canadian Litigation Defendants;
 - b) an [Initial Recognition Order](#) (Foreign Main Proceeding) dated August 19, 2022 (the “Initial Recognition Order”), among other things:
 - i. recognizing the Chapter 11 Proceedings as a “foreign main proceeding” and recognizing Paladin as the “foreign representative” in respect of the Chapter 11 Proceedings, as such terms are defined in section 45 of the CCAA; and
 - ii. declaring that the Interim Order shall be of no further force or effect upon the effectiveness of the Initial Recognition Order and the First Supplemental Order; and
 - c) a [Supplemental Order](#) (Foreign Main Proceeding) dated August 19, 2022 (the “First Supplemental Order”), *inter alia*:
 - i. recognizing certain of the First Day Orders of the US Court;
 - ii. granting a stay of proceedings in respect of the Canadian Debtors, the property and business of the Canadian Debtors, the Canadian Litigation Defendants, and the directors and officers of the Canadian Debtors and the Canadian Litigation Defendants; and

² Throughout this Report, words in blue text and underlined are hyperlinked to the Information Officer’s website.

- iii. appointing KSV Restructuring Inc. (“KSV”) as information officer in respect of these Canadian recognition proceedings (the “Information Officer”).
4. On September 28, 2022, the US Court heard certain second day motions (the “Second Day Hearing”) filed by the Debtors in the Chapter 11 Proceedings and entered certain orders in respect of such motions (collectively, the “Second Day Orders”).
5. On October 13, 2022, this Court made an order (the “[Second Supplemental Order](#)”) recognizing and enforcing certain of the Second Day Orders, which are summarized in the Information Officer’s [First Report to Court dated October 10, 2022](#) (the “First Report”).
6. On November 29, 2022, this Court made an order (the “[Third Supplemental Order](#)”) recognizing and enforcing the following orders, which are summarized in the Information Officer’s [Second Report to Court dated November 24, 2022](#) (the “Second Report”):
 - a) De Minimis Assets Order;
 - b) Creditor Listing Order;
 - c) Final Cash Collateral Order;
 - d) Combined Wages Order; and
 - e) Final Wages Order.
7. Since November 29, 2022, the US Court has entered certain additional orders³, including the:
 - a) Bidding Procedures Order; and
 - b) Bar Date Order (collectively, the “Additional Orders”).
8. The Foreign Representative is now seeking to have this Court recognize and enforce the Additional Orders in Canada pursuant to an order under Section 49 of the CCAA (the “Fourth Supplemental Order”).
9. This Report has been prepared and will be filed with the Court by KSV in its capacity as the Information Officer.

³ Each as defined in the Third Vas Affidavit (as defined below).

1.1 Purposes of this Report

1. The purposes of this Report are to:
 - a) provide an update with respect to the Chapter 11 proceedings;
 - b) provide a summary of the activities of the Information Officer since the date of the Second Report;
 - c) summarize the Information Officer's fees and those of its counsel, Bennett Jones LLP ("Bennett Jones"), from the commencement of the proceedings to March 31, 2023; and
 - d) recommend that this Court:
 - i. grant the relief being sought by the Foreign Representative pursuant to the proposed Fourth Supplemental Order; and
 - ii. approve the Information Officer's activities for the period from the commencement of the proceedings to the date of this Report; and
 - iii. approve the fees and disbursements of the Information Officer and Bennett Jones for the period from the commencement of the proceedings to March 31, 2023.

1.2 Currency

1. All currency references in this Report are to US dollars, unless otherwise stated.

1.3 Defined Terms

1. Capitalized terms not otherwise defined in this Report have the meanings given to them in the [Affidavit of Daniel Vas sown April 18, 2023](#) (the "Third Vas Affidavit").

1.4 Restrictions

1. In preparing this Report, the Information Officer has relied upon unaudited financial information prepared by the Debtors' representatives, the Debtors' books and records and discussions with the Canadian Debtors' counsel.
2. The Information Officer has not performed an audit or other verification of such information. An examination of the Debtors' financial forecasts as outlined in the *Chartered Professional Accountants of Canada Handbook* has not been performed. Future oriented financial information relied upon in this Report is based on the Debtors' assumptions regarding future events; actual results achieved may vary from this information and these variations may be material.
3. The Information Officer expresses no opinion or other form of assurance with respect to the accuracy of any financial information presented in this Report or relied upon by the Information Officer in its preparation of this Report.

2.0 Background

1. The Canadian Debtors are part of a global specialty pharmaceutical group that produces and sells both generic and branded products. Endo Parent is an Irish publicly-traded company headquartered in Dublin, Ireland.
2. While Endo's global headquarters are in Ireland, the majority of its business is conducted in the United States. Indeed, in 2021, Endo earned approximately 97% of its total consolidated revenue from customers in the United States. The Company's United States headquarters is located in Malvern, Pennsylvania and its primary U.S. manufacturing facility is located in Rochester, Michigan.
3. Paladin is Endo's Canadian operating company. Paladin sells specialty pharmaceutical products that it owns, licenses or distributes to a variety of customers, including wholesalers, hospitals, governmental entities and pharmacies. Paladin Holding is a holding company that owns all of the shares of Paladin.
4. Of the approximately 1,560 employees employed by the Debtors as of the Petition Date, 98 were employees of Paladin. None of Paladin's employees are unionized.
5. Endo's financial performance preceding the Petition Date had been negatively impacted by several factors, including a significant decline in revenues and increased generic competition relating to Vasoprost, Endo's single largest product by revenue in 2021, and the Company's litigation overhang, including the Canadian Opioid Lawsuits. In light of its financial performance and the circumstances facing the Company, Endo's highly-leveraged capital structure – including \$8 billion in secured and unsecured indebtedness, which is guaranteed by the Canadian Debtors – and related debt servicing costs became unsustainable.
6. Further information concerning the Debtors' background, corporate structure, prepetition capital structure and indebtedness, and the events preceding the Chapter 11 Proceedings is provided in the [Affidavit of Daniel Vas sworn August 17, 2022](#).
7. All materials filed with this Court in these Canadian recognition proceedings are available on the Information Officer's website at <https://www.ksvadvisory.com/experience/case/endo>.

3.0 Status of the Chapter 11 Proceedings

1. On or around the Petition Date, the Debtors entered into a restructuring support agreement (the "RSA") with a group consisting primarily of holders of first-lien indebtedness of the Debtors (the "Ad Hoc First Lien Group"). The Ad Hoc First Lien Group is made up primarily of the Prepetition First Lien Lenders and the Prepetition First Lien Noteholders. The RSA contemplates a credit bid acquisition of substantially all the Debtors' assets by an entity formed by the Ad Hoc First Lien Group, which will serve as a stalking horse bid (the "Stalking Horse Bid") in a post-petition bidding and sale process (including an auction, to the extent necessary) to be conducted during the Chapter 11 Proceedings.

2. On November 23, 2022, the Debtors filed a motion for the approval of the Bidding Procedures Order and the Bar Date Order with the US Court.
3. Several of the Debtors' stakeholders filed objections to the Bidding Procedures motion and/or the Bar Date motion, including:
 - a) the Official Committee of Unsecured Creditors (the "UCC");
 - b) the Official Committee of Opioid Claimants (the "OCC");
 - c) the legal representative for future claimants appointed by the Bankruptcy Court (the "FCR");
 - d) an ad hoc group of holders of first-lien, second-lien and unsecured indebtedness of the Debtors (the "Ad Hoc Cross-Holder Group");
 - e) an ad hoc group of holders of first-lien and certain other indebtedness of the Debtors who were not party to the RSA (the "Non-RSA 1Ls");
 - f) an ad hoc group of unsecured noteholders of the Debtors;
 - g) the United States Trustee; and
 - h) certain distributors, manufacturers and pharmacies having business relationships with the Debtors (the "DMP Group").
4. On January 23, 2023, the UCC and the OCC (collectively, the "Committees") filed a motion (the "Joint Standing Motion") seeking standing to permit the Committees to commence and prosecute complaints related to the validity of the liens of the Prepetition First Lien Secured Parties (as defined in the Cash Collateral Order) and a complaint related to prepetition compensation of the Debtors' executives and other personnel (the "Challenge Complaints").
5. On January 27, 2023, the US Court ordered a mediation among the Debtors, the Ad Hoc First Lien Group, the Ad Hoc Cross-Holder Group, the Non-RSA 1Ls, the UCC, the OCC and the FCR, among others (the "Mediation"), to address, among other things, the Bidding Procedures motion and the Challenge Complaints.
6. On March 3, 2023, the Debtors advised the US Court that the Ad Hoc First Lien Group had reached resolutions in principle with the OCC, the UCC, the Ad Hoc Cross-Holder Group and the Non-RSA 1Ls that would resolve certain of these parties' objections relating to the Debtors' proposed marketing and sale process. As a result, on March 24, 2023, the following documents, among others, were filed with the US Court:
 - a) *Stipulation Among the Debtors, Official Committee of Unsecured Creditors, Official Committee of Opioid Claimants, and Ad Hoc First Lien Group Regarding Resolution of Joint Standing Motion* (the "Resolution Stipulation")
 - b) Notice of Filing of Amended and Restated Restructuring Support Agreement, containing an Amended RSA which attaches, among other things, an amended Stalking Horse Agreement

7. As a result of the resolutions reflected in the Resolution Stipulation and the Amended RSA, the Debtors were able to move forward with the Bidding Procedures Motion and the Bar Date Motion with the support of key stakeholders.

3.1 Resolution Stipulation

1. The Resolution Stipulation includes term sheets documenting the resolutions reached between the Ad Hoc First Lien Group and each of the OCC and the UCC (the “OCC Resolution Term Sheet” and the “UCC Resolution Term Sheet,” respectively, and, together, the “Committees Resolution Term Sheets”).
2. The key terms of the Resolution Stipulation provide that:
 - a) the Stalking Horse Bidder is permitted to credit bid the Prepetition First Lien Indebtedness;
 - b) the prosecution of the Joint Standing Motion is held in abeyance and each of the Committees agrees not to prosecute the Joint Standing Motion from the commencement of the Resolution Stipulation to the date, if any, on which one or both of the Committees exercise their termination rights following the occurrence of a Termination Event;
 - c) the Joint Standing Motion will be withdrawn when the Stalking Horse Bid transaction closes and the Voluntary GUC Creditor Trust and the PPOC Trust (both as defined below) are established and funded; and
 - d) the Committees agree to support the restructuring set out in the Amended RSA, including the entry of the Bidding Procedures Order and the Acceptable Sale Order by the US Court.
3. A key aspect of the Resolution Stipulation was that the Stalking Horse Bidder agreed, if it is the successful bidder, to create and fund trusts for the benefit of i) the general unsecured creditors (the “Voluntary GUC Creditor Trust”); and ii) the present private opioid claimants (the “PPOC Trust”). These are in addition to the trusts for the benefit of i) certain public opioid claimants (the “Public Opioid Trust”); and ii) the tribal opioid claimants (the “Tribal Opioid Trust”) that the Stalking Horse Bidder agreed to set up at the commencement of the Chapter 11 Cases.
4. The Stalking Horse Bidder (if it is the Successful Bidder) will establish and fund the Voluntary GUC Creditor Trust for the benefit of the Voluntary GUC Creditor Trust Beneficiaries. Holders of Eligible Unsecured Claims will have the option to participate in the Voluntary GUC Creditor Trust provided that they, among other things, execute a consensual and voluntary release with respect to certain claims against the Released Parties (which include the Debtors and Stalking Horse Bidder) and do not object to the resolutions in the UCC Resolution Term Sheet or Resolution Stipulation. Holders of Eligible Unsecured Claims that do not execute a release will not be entitled to participate in the Voluntary GUC Creditor Trust and will retain their rights and remedies, as applicable.

5. The Stalking Horse Bidder (if it is the Successful Bidder) will establish and fund the PPOC Trust for the benefit of the Participating PPOCs. Present Private Opioid Claimants will have the option to participate in the PPOC Trust provided that they, among other things, file a proof of claim and execute a release in favor of the Released Parties. PPOCs that do not participate in the PPOC Trust will retain their rights and remedies.
6. An amended Public/Private Opioid Term Sheet setting out the terms of the Public Opioid Trust and the Tribal Opioid Trust was attached to the Amended RSA. It contemplates that the Order of the US Court approving the Stalking Horse Bid will contain a release by Participating Public Opioid Claimants and Tribal Opioid Claimants and a consensual injunction against the Released Parties. The Information Officer notes that public entities in Canada with potential or asserted claims against the Debtors (including Canadian governments) are not eligible to participate in the Public Opioid Trust or the Tribal Opioid Trust.
7. The key amounts to be provided by the Stalking Horse Bidder to each trust (collectively, the "Trusts") are as follows:
 - a) Voluntary GUC Creditor Trust: \$60 million, plus 4.25% of the issued and outstanding shares of the Stalking Horse Bidder on a fully diluted basis⁴, plus a vesting of i) estate claims and actions against third parties and certain other parties; ii) all of the Stalking Horse Bidder's rights under insurance policies that may provide coverage for Eligible Unsecured Claims; and iii) the sole and exclusive right to pursue the Debtors' opioid-related claims and the proceeds of any applicable insurance policies;
 - b) PPOC Trust: \$119 million in total based on \$29.7 million on the Closing Date, plus \$29.7 million on the first anniversary of the Closing Date and \$59.7 million on the second anniversary of the Closing Date;
 - c) Public Opioid Trust: \$465 million in accordance with an instalment schedule; and
 - d) Tribal Opioid Trust: \$15 million in accordance with an instalment schedule.
8. Further information regarding the Resolution Stipulation and the Committees Resolution Term Sheets is included in the Third Vas Affidavit. The Information Officer notes that the Committees Resolution Term Sheets have not yet been submitted for approval by the US Court and the Foreign Representative is not seeking this Court's approval or recognition of the Trusts in the Fourth Supplemental Order.

⁴ Subject only to dilution by the management incentive plan and subject to adjustment if the Stalking Horse Bidder's net funded debt exceeds or is less than \$2.5 billion.

4.0 Additional Orders Proposed to be Recognized by this Court

1. The Third Vas Affidavit provides additional information on each of the Additional Orders summarized below. All of the Additional Orders referenced above are attached to the Third Vas Affidavit.

4.1 The Bidding Procedures Order

1. The US Court entered the Bidding Procedures Order on April 2, 2023.
2. Among other things, the Bidding Procedures Order:
 - a) authorizes and approves bidding procedures (the “Bidding Procedures”) in connection with the sale or sales of substantially all of the Debtors’ assets pursuant to section 363 of the Bankruptcy Code (the “Sale”);
 - b) authorizes and approves the terms and conditions of the Expense Reimbursement Amount included in the Stalking Horse Agreement;
 - c) authorizes certain steps to be taken to implement the Sale in a tax efficient manner under Irish tax law;
 - d) authorizes and approves i) the form of notice of the Auction (if any), the Sale and the hearing to consider the Sale (the “Sale Notice”); and ii) the procedures for distributing the Sale Notice to known claimants, the plan for providing notice to unknown claimants and the method of distributing the Sale Notice (the Sale Notice Procedures”); and
 - e) authorizes the Assumption and Assignment Procedures to facilitate the assumption, assumption and assignment and/or rejection of certain executory contracts (the “Contracts”) or unexpired leases (the “Leases”) of the Debtors.

4.1.1 The Stalking Horse Agreement

1. The key terms of the Stalking Horse Agreement and related documents are summarized below:
 - a) Purchaser: Tensor Limited, an entity formed by the Ad Hoc First Lien Group.
 - b) Purchased Assets: Substantially all of the Debtors’ assets, including the Canadian Debtors’ right, title and interest in and to the Transferred Assets.
 - c) Purchase Price: Credit bid of the full amount of the approximately \$5.9 billion of Prepetition First Lien Indebtedness, plus \$5 million on account of certain unencumbered Transferred Assets, plus \$116 million to fund an orderly wind-down process, plus pre-closing professional fee reserves, plus the assumption of the Assumed Liabilities.
 - d) Expense Reimbursement: Up to \$7 million in respect of the Required Holders’ Advisors.
 - e) Employees: Offer employment to all of the Debtors’ employees generally for positions and responsibilities that are consistent with each employees’ current positions and responsibilities.

- f) Contracts: Assume and cure a significant number of trade contracts, subject to the right of the Stalking Horse Bidder to reject contracts at its discretion.
 - g) Trusts: Establish and fund the Trusts.
 - h) Liabilities: Assume the Assumed Liabilities which include, among other things, all liabilities under Transferred Contracts, cure claims in connection with the assumption of Transferred Contracts, and compliance with obligations under Canadian Labor Laws.
- 2. A copy of the Stalking Horse Agreement is included in the Third Vas Affidavit.
 - 3. The completion of the transactions set out in the Stalking Horse Agreement by the Canadian Debtors is conditional upon the Court granting an order recognizing the US Court's Sale Order.

4.1.2 The Bidding Procedures

- 1. The Debtors will solicit bids for either i) all of or substantially all of the Debtors' assets; or ii) one or more of certain business or assets segments specified in the Bidding Procedures. The Debtors will also consider bids for any individual assets or collection of assets that is less than all or substantially all the Debtors' assets.
- 2. The Bidding Procedures includes a two-stage process followed by an auction, if necessary, to determine the Successful Bid(s). In the first phase, Prospective Bidders will be granted access to a data room and confidential information memorandum. In order to participate in the second phase, Prospective Bidders must submit a non-binding Indication of Interest by the Indication of Interest Deadline that complies with the Bidding Procedures and is acceptable to the Debtors in consultation with the UCC, OCC, the FCR and, in certain circumstances following the Bid Deadline, the Required Consenting Global First Lien Creditors and the Ad Hoc Cross-Holder Group.
- 3. If no Indications of Interest that are likely to result in the submission of a Qualified Bid are received by the Indication of Interest Deadline, the Debtors can terminate the sale and marketing process and accelerate the sale hearing to seek final approval of the Stalking Horse Bid.
- 4. In the second phase, each Acceptable Bidder must submit a binding Bid by the Bid Deadline that constitutes a Qualified Bid. The Bid must exceed the Minimum Bid Amount (being \$5,862,679,000, plus \$5 million on account of certain unencumbered Transferred Assets, plus \$116 million to fund an orderly wind-down process).
- 5. The Bidding Procedures contain a list of non-binding factors that the Debtors may take into consideration in evaluating a Bid, including the value of the Bid, its impact on various creditor groups, and whether the Bid provides for the establishment of a trust or other consideration for the benefit of public and private opioid claimants and/or non-opioid general unsecured creditors and the terms of any such trusts.

6. If the Debtors, in consultation with the Consultation Parties, determine that there is more than one Qualified Bid, then the Debtors are authorized to conduct an Auction. The Bidding Procedures set forth the details for participation in the Auction, minimum bidding increments and other procedures with respect to the Auction.
7. Key dates and deadlines in the Bidding Procedures are summarized below:

Deadline	Date
Indication of Interest Deadline	June 13, 2023
Deadline for Debtors to file Sale Acceleration Election Notice	June 20, 2023
Date of Accelerated Sale Hearing (if applicable)	July 28, 2023
Bid Deadline to submit a Qualified Bid	August 8, 2023
Auction date, if applicable	August 15, 2023
Date of Bankruptcy Court Sale Hearing (unless accelerated)	August 31, 2023

4.1.3 Sale Notice Procedures

1. The Bidding Procedures Order also approves the Sale Notice Procedures, which include the Sale Notice and the Supplemental Plan Notice.
2. The Sale Notice will be provided to all known counterparties to contracts or leases, known creditors (including regulatory authorities and government authorities), all known parties to litigation with the Debtors, all current employees of the Debtors, all former employees terminated on or after January 1, 2016 and other known potential claimants.
3. The Supplemental Notice Plan is intended to reach potential, unknown claimants through television, social media, online displays, ads, billboards, print media, press releases and community outreach and is estimated to reach over 80% of all adults over the age of 18 in Canada on average three to four times.

4.1.4 Assumption and Assignment Procedures

1. The Bidding Procedures Order: (a) approves the Assumption and Assignment Procedures and the related Assumption and Assignment Notice; and (b) provides that the Assumption and Assignment Procedures shall govern the assumption or assumption and assignment of all of the Debtors' Contracts and Leases to be assumed or assumed and assigned in connection with the Sale, subject to the payment of any Cure Costs necessary to cure any defaults arising under any such Contract or Lease.
2. Any counterparty that wishes to object to the proposed Cure Cost, the assumption and assignment of an Assigned Contract, or the deemed amendment of any indemnity provisions in an Assigned Contract must file a Cure Objection in accordance with the process set forth in the Assumption and Assignment Notice. If a Cure Objection is filed in accordance with the procedures set forth in the Assumption and Assignment Notice, the applicable Contract or Lease shall not be deemed assumed and assigned unless the Debtors agree to a consensual resolution of such Cure Objection. The Debtors may determine to reject such Contract or Lease in lieu of assuming the Contract or Lease without such amendments or releases.

4.2 The Bar Date Order

1. As a result of the resolutions reached in the Mediation, the Bar Date Order was granted by the US Court without opposition.
2. The Bar Date Order provides, among other things, deadlines for filing Proofs of Claim and the process to provide notice to known creditors, unknown creditors and parties in interest.
3. The notice of the Bar Dates will be sent concurrently with the Notice of Sale.
4. The following table sets out the various Bar Dates for the filing of Claims pursuant to the Bar Date Order:

Matter	Deadline (EST)
General Bar Date	July 7, 2023 at 5:00 p.m.
Governmental Bar Date	May 31, 2023 at 5:00 p.m.
State/Local Governmental Opioid Bar Date	The earlier of (i) 10:00 a.m. on the date set for the first disclosure statement hearing for any chapter 11 plan in the Chapter 11 Cases; and (ii) 5:00 p.m. on the date that is 35 days after the date on which the Debtors file on the docket and serve a supplemental notice setting a deadline for such parties.
Amended Schedule Bar Date	For claimants holding Claims negatively impacted by the filing of a previously unfiled schedule of assets and liabilities or statement of financial affairs or an amendment or supplement to such schedules or statements, the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m. on the date that is 30 days after the date on which the Debtors provide notice of such filing, amendment or supplement.
Rejection Bar Date	For counterparties to executory contracts or unexpired leases that have been rejected by the Debtors, the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m. on the date that is 30 days after the effective date of such rejection.

5. The Bar Date Order provides that the Debtors will cause to be mailed a Bar Date Notice, the applicable Proof of Claim Form, and the Proof of Claim instructions by first class mail to known claimants with actual Claims against the Debtors, parties known to the Debtors as having potential Claims against the Debtors, and other known parties in interest entitled to notice of the Bar Dates.
6. The Bar Date Order also provides for a Supplemental Notice Plan that provides unknown claimants with publication notice of the Bar Dates and the procedures for filing Proofs of Claim in the Chapter 11 Cases.
7. As set forth in the Resolution Stipulation, the Debtors will include in their Bar Date mailings a letter from each of the OCC and the UCC to their respective constituents providing certain information relating to the trusts to be established in accordance with the Committees Resolution Term Sheets.

8. The Bar Date Order specifies certain categories of Claims for which a party is not required to file a Proof of Claim in the Chapter 11 Cases, including, among others: (a) Claims against the Debtors that are not listed as disputed, contingent, or unliquidated in the Schedules; (b) claims represented by the FCR; and (c) where the holder of such Claim agrees with the nature, classification, and amount of its Claim as identified in the Schedules.
9. The Bar Date Order provides that any party that is required to file a Proof of Claim but that fails to do so by the applicable Bar Date shall be forever barred, estopped, and enjoined from: (a) asserting any Unscheduled Claim against the Debtors or their estates or properties (and the Debtors and their properties and estates will be forever discharged from any and all indebtedness or liability with respect to such Claim); or (b) voting on, or receiving distributions under, any chapter 11 plan in the Chapter 11 Cases in respect of an Unscheduled Claim.

4.3 Recommendation

1. The Information Officer is of the view that the Foreign Representative's motion for the Fourth Supplemental Order is reasonable and appropriate for the following reasons:
 - a) the order is consistent with the integrated nature of the Debtors' operations in the US and Canada;
 - b) Canadian stakeholders are treated in the same manner as US stakeholders in each of the Additional Orders;
 - c) the Fourth Supplemental Order has the objective of enhancing the prospect that the Debtors can continue to operate in the normal course during the Chapter 11 Proceedings;
 - d) the Information Officer is not aware of any objection having been filed in the Chapter 11 Proceedings by a Canadian stakeholder in respect of the Additional Orders;⁵
 - e) with respect to the Bidding Procedures Order;
 - i. the Debtors obtained the support of the Ad Hoc First Lien Group, the UCC, the OCC, the Ad Hoc-Cross Holder Group and the Non-RSA 1Ls as a result of the Mediation;
 - ii. the Mediation resulted in an Amended RSA and amended Stalking Horse Agreement which provides for contributions into several trusts (as summarized above) for the benefit of unsecured creditors, including certain opioid claimants;
 - iii. the Bidding Procedures Order preserves the right of all parties with respect to the approval of the Sale;

⁵ An objection to the Bidding Procedures motion filed by the DMP Group, which group includes certain Canadian entities, was resolved with the Debtors on a consensual basis in advance of the US Court hearing.

- iv. the Bidding Procedures provide the Debtors with an appropriately extended period of time to market the Debtors' business and assets and solicit interest. The preliminary deadline provides Prospective Bidders with roughly two months since the Bidding Procedures Order was entered in the US Court to submit an Indication of Interest and a further 2 months to perform due diligence and submit a Qualified Bid;
 - v. the Stalking Horse Bid provides certainty with respect to the sale of the Debtors' assets which provides for the continuity of the Debtors' (and Canadian Debtors') business, continued employment of the Debtors' employees and ongoing business with vendors;
 - vi. the amount of the Expense Reimbursement is based on actual costs incurred and is reasonable in these circumstances. The Stalking Horse Bidder is not entitled to a break fee in the event it is not the Successful Bidder; and
 - vii. the Sale Notice Procedures represent an extensive effort to notify all known and unknown stakeholders;
- f) with respect to the Bar Date Order;
- i. it is unopposed as a result of the resolutions reached in the Mediation;
 - ii. extensive notice of the Bar Dates will be provided to known and unknown creditors of the Debtors, including to known and unknown creditors in Canada;
 - iii. the Information Officer intends to post notice of the Bar Dates on its Website;
 - iv. all creditors have a reasonable amount of time to file claims; and
 - v. the Bar Dates mailings will be sent concurrently with the Notice of Sale, which will reduce duplication of work and cost.

5.0 Overview of the Information Officer's Activities

1. In addition to the activities set out in the First Report and the Second Report, the activities of the Information Officer have, among other things, included:
 - a) corresponding with Goodmans LLP ("Goodmans"), the Canadian Debtors' counsel, and Bennett Jones regarding key matters in the Chapter 11 Proceedings and the CCAA proceedings;
 - b) monitoring the Claims and Noticing Agent's website established in connection with the Chapter 11 Proceedings (the "Docket");
 - c) reviewing materials filed in the Chapter 11 Proceedings;

- d) attending hearings of the US Court in the Chapter 11 Proceedings via telephone to remain apprised of material updates therein;
- e) reviewing the Mediation Order and corresponding with Bennett Jones regarding same;
- f) reviewing the Stipulation Resolution;
- g) reviewing several versions of the Bidding Procedures Order posted on the Docket and corresponding with Bennett Jones regarding same;
- h) reviewing the Bar Date Order;
- i) reviewing the objections filed by the UCC, OCC and the Non-RSA First Lien Lenders and the Debtors' supplemental reply to the objections;
- j) reviewing the Stalking Horse Bid and the Amended RSA;
- k) corresponding with certain of the Canadian Debtors' creditors;
- l) preparing this Report; and
- m) engaging in discussions with management to the Canadian Debtors and assisting the Canadian Debtors with certain creditor matters.

6.0 Professional Fees

1. The fees of the Information Officer and Bennett Jones from the date of the appointment of the Information Officer on August 19, 2022 to March 31, 2023 total \$122,549 and \$166,042, respectively, excluding disbursements and HST. Fee affidavits and accompanying invoices for the Information Officer and Bennett Jones are attached as Appendices "A" and "B", respectively.
2. The activities of the Information Officer are detailed in the Information Officer's invoices, in this Report and in the First Report.
3. The average hourly rate for the Information Officer and Bennett Jones for the referenced billing period was \$563.06 and \$717.55, respectively.
4. The Information Officer is of the view that Bennett Jones' hourly rates are consistent with the rates charged by other law firms practicing in the area of restructuring and insolvency in the Toronto market, and that its fees are reasonable and appropriate in the circumstances.

7.0 Conclusion and Recommendation

1. Based on the foregoing, the Information Officer recommends that this Court grant the relief being sought by the Foreign Representative pursuant to the proposed Fourth Supplemental Order.

* * *

All of which is respectfully submitted,

KSV Restructuring Inc.

**KSV RESTRUCTURING INC. AS
INFORMATION OFFICER OF PALADIN LABS CANADIAN HOLDING INC.
AND PALADIN LABS INC.,
AND NOT IN ITS PERSONAL CAPACITY**

Appendix “A”

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C 1985, C.C-36, AS AMENDED

AND IN THE MATTER OF PALADIN LABS CANADIAN HOLDING INC. AND
PALADIN LABS INC.

APPLICATION OF PALADIN LABS INC. UNDER SECTION 46 OF THE *COMPANIES'*
CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AFFIDAVIT OF NOAH GOLDSTEIN
(Sworn April 20, 2023)

I, Noah Goldstein, of the City of Toronto, in the Province of Ontario, MAKE OATH AND
SAY:

1. I am a Managing Director of KSV Restructuring Inc. ("**KSV**").
2. On August 19, 2022, the Ontario Superior Court of Justice (Commercial List) (the "Canadian Court") issued the Initial Recognition Order and Supplemental Order pursuant to Part IV of the *Companies' Creditors Arrangement Act* ("CCAA") and KSV was appointed Information Officer ("Information Officer").
3. I have been involved in this mandate since the date of the Initial Recognition Order and Supplemental Order. As such, I have knowledge of the matters to which I hereinafter depose.
4. On April 20, 2023, the Information Officer finalized its Third Report to Court in which it outlined its activities with respect to these proceedings as well as provided information with respect to the Information Officer's fees and disbursements and those of its legal counsel.

5. I hereby confirm that attached as Exhibit “A” hereto are true copies of the accounts of KSV from the commencement of these proceedings to March 31, 2023 and confirm that these accounts accurately reflect the services provided by KSV in this matter and the fees and disbursements claimed by them.

6. Additionally, attached hereto as Exhibit “B” is a summary of additional information with respect to all members of KSV who have worked on this matter, including their roles, hours and rates, and I hereby confirm that the list represents an accurate account of such information.

7. I consider the accounts to be fair and reasonable considering the circumstances connected with this administration.

8. I also confirm that the Information Officer has not received, nor expects to receive, nor has the Information Officer been promised any remuneration or consideration other than the amounts claimed in the accounts.

SWORN BEFORE ME at the City of)
Toronto, in the Province of Ontario, this)
20th day of April, 2023.)
)
)
)
Catherine Anne Stuyck-Therault, a Commissioner, etc.,)
Province of Ontario for KSV Advisory Inc. and)
KSV Restructuring Inc.)
Expires February 19, 2025)



NOAH GOLDSTEIN

THIS IS EXHIBIT "A" REFERRED TO IN THE
AFFIDAVIT OF NOAH GOLDSTEIN
SWORN BEFORE ME THIS 20th DAY OF APRIL, 2023



Catherine Anne Stuyck-Therault, a Commissioner, etc.,
Province of Ontario for KSV Advisory Inc. and
KSV Restructuring Inc.
Expires February 19, 2025



Noah Goldstein
kvs advisory inc.

150 King Street West, Suite 2308
Toronto, Ontario, M5H 1J9
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F +1 416 932 6266

ngoldstein@kvsadvisory.com
kvsadvisory.com

November 16, 2022

DELIVERED BY EMAIL

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon, Suite 600
Montreal, QC H4M 2P2
Canada

Attention: Legal Billing

Dear Sirs:

**Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the "Canadian Debtors")**

Enclosed please find our invoice for services rendered for the period from the commencement of the proceeding to October 31, 2022 in our capacity as Information Officer, appointed pursuant to an Order of the Ontario Superior Court of Justice (Commercial List) made on August 19th, 2022.

Should you have any questions regarding the enclosed, please contact the undersigned.

Yours very truly,

**KSV RESTRUCTURING INC.
IN ITS CAPACITY AS INFORMATION OFFICER OF
THE CANADIAN DEBTORS
AND NOT IN ITS PERSONAL CAPACITY**

Per: Noah Goldstein

NG: lq
Encl(s)



ksv advisory inc.

150 King Street West, Suite 2308

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ksvadvisory.com

INVOICE

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon Suite 600
Montreal, QC H4M 2P2
Canada

November 16, 2022

Invoice No: 2831
HST #: 818808768RT0001

**Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the “Canadian Debtors”)**

For professional services rendered for the period from the commencement of the proceedings to October 31, 2022 by KSV Restructuring Inc. (“KSV”) in its capacity as Court-appointed Information Officer of the Canadian Debtors, including:

- Corresponding throughout the period with Goodmans LLP (“Goodmans”), Canadian counsel to the Canadian Debtors and its US parent and certain affiliates (collectively, the “Chapter 11 Debtors”), and Bennett Jones LLP (“Bennett Jones”), counsel to the Information Officer, regarding the proceedings commenced by the Chapter 11 Debtors pursuant to chapter 11 of title 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York (the “US Court”) (the “Chapter 11 Proceedings”);
- Corresponding with Goodmans and Bennett Jones regarding an overview of the prospective Canadian proceedings, background information on the Chapter 11 Proceedings and Chapter 11 Debtors and details about the Canadian Debtors’ operations, assets, creditors and employees
- Attending a call on August 11, 2022 with Goodmans and Bennett Jones regarding the Canadian proceedings and Chapter 11 Proceedings;
- Corresponding with Alvarez & Marsal North America, LLC, the Chapter 11 Debtors’ US financial advisor regarding treasury cut-off procedures in Canada;

- Reviewing all materials filed with the US Court in the Chapter 11 Proceedings in advance of the “First Day Motions” before the US Court, including, but not limited to:
 - Declaration of Mark Bradley sworn August 17, 2022;
 - Foreign Representative Order;
 - Joint Administration Order;
 - Notice of Stay Order;
 - Interim Wages Order;
 - Interim Customer Programs Order;
 - Interim Vendor Order;
 - Interim Taxes Order;
 - Interim Insurance Order;
 - Interim Cash Management Order; and
 - Interim Cash Collateral Order.
- Attending the virtual hearing on August 18, 2022 regarding the First Day Motions in the Chapter 11 Proceedings;
- Monitoring the case management website maintained by Kroll Restructuring Administration LLC in respect of materials filed in the Chapter 11 Proceedings (the “US Case Website”) and reviewing certain information related to the Canadian Debtors;
- Reviewing draft materials to be filed with the Canadian Court, including draft versions of the:
 - Notice of Application;
 - Affidavit of Daniel Vas sworn August 17, 2022;
 - Factum;
 - Interim Order;
 - Initial Recognition Order; and
 - Supplemental Order;
- Attending the Canadian Court hearing on August 17, 2022;
- Reviewing the Interim Order and Endorsement of Chief Justice Morawetz dated August 17, 2022;

- Reviewing the Affidavit of Nargis Fazli sworn August 19, 2022;
- Attending the Canadian Court hearing on August 19, 2022;
- Reviewing the Initial Recognition Order and Supplemental Order, both dated August 19, 2022, and the Endorsement dated August 30, 2022, of Chief Justice Morawetz;
- Reviewing the press release and other news relating to the Chapter 11 Proceedings;
- Arranging for the publication of a notice of these proceedings in the Globe and Mail (National Edition) as required under the Supplemental Order;
- Arranging for the publication of a notice of these proceedings in Le Devoir as required under the Supplemental Order;
- Corresponding with Bennett Jones regarding materials posted on the US Case Website;
- Attending bi-weekly calls with the Canadian Debtors to obtain an update on their operations;
- Reviewing materials filed in the Chapter 11 Proceedings including the:
 - Future Claimants Representative Order;
 - Second Interim Wages Order;
 - Final Customer Programs Order;
 - Final Vendor Order;
 - Final Taxes Order;
 - Final Insurance Order;
 - Final Cash Management Order; and
 - Utilities Order;
- Attending the virtual hearing on September 28, 2022 regarding certain First Day Motions in the Chapter 11 Proceedings;
- Preparing the First Report of the Information Officer dated October 10, 2022 (the “First Report”);
- Corresponding with Bennett Jones regarding the First Report;
- Reviewing the Canadian Debtors’ draft motion materials including draft versions of the:
 - Notice of Motion;

- Affidavit of Daniel Vas sworn October 7, 2022;
- Affidavit of Andrew Harnes sworn October 7, 2022; and
- Second Supplemental Order;
- Corresponding with Bennett Jones regarding the draft motion materials;
- Attending the Canadian Court hearing on October 13, 2022;
- Reviewing the Second Supplemental Order dated October 13, 2022, and the Endorsement dated October 17, 2022 of Chief Justice Morawetz;
- Attending the US Court hearing on October 13, 2022 regarding the recognition of certain orders;
- Corresponding with creditors of the Canadian Debtors;
- Maintaining the Information Officer's case website;
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees per attached time summary	CAD\$	42,810.25
HST		<u>5,565.33</u>
Total due	CAD\$	<u><u>48,375.58</u></u>

KSV Restructuring Inc.
Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.

Time Summary

For the period ending October 31, 2022

Personnel	Role	Rate (\$)	Hours	Amount (\$)
Noah Goldstein	Overall responsibility	675	47.50	32,062.50
Jordan Wong	All aspects of the mandate	495	20.00	9,900.00
Other Staff and Administration			4.85	847.75
Total Fees				<u>42,810.25</u>



Noah Goldstein
kvs advisory inc.

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ngoldstein@kvsadvisory.com
kvsadvisory.com

January 23, 2023

DELIVERED BY EMAIL

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon, Suite 600
Montreal, QC H4M 2P2
Canada

Attention: Legal Billing

Dear Sirs:

Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the "Canadian Debtors")

Enclosed please find our invoice for services rendered for the period from November 1 to December 31, 2022 in our capacity as Information Officer, appointed pursuant to an Order of the Ontario Superior Court of Justice (Commercial List) made on August 19th, 2022.

Should you have any questions regarding the enclosed, please contact the undersigned.

Yours very truly,

KSV RESTRUCTURING INC.
IN ITS CAPACITY AS INFORMATION OFFICER OF
THE CANADIAN DEBTORS
AND NOT IN ITS PERSONAL CAPACITY

Per: Noah Goldstein

NG: lq
Encl(s)



ksv advisory inc.

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ksvadvisory.com

INVOICE

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon Suite 600
Montreal, QC H4M 2P2
Canada

January 23, 2023

Invoice No: 2932
HST #: 818808768RT0001

**Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the “Canadian Debtors”)**

For professional services rendered for the period from November 1 to December 31, 2022 by KSV Restructuring Inc. (“KSV”) in its capacity as Court-appointed Information Officer of the Canadian Debtors, including:

- Corresponding throughout the period with Goodmans LLP (“Goodmans”), Canadian counsel to the Canadian Debtors and its US parent and certain affiliates (collectively, the “Chapter 11 Debtors”), and Bennett Jones LLP (“Bennett Jones”), counsel to the Information Officer, regarding the proceedings commenced by the Chapter 11 Debtors pursuant to chapter 11 of title 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York (the “US Court”) (the “Chapter 11 Proceedings”);
- Monitoring the case management website maintained by Kroll Restructuring Administration LLC in respect of materials filed in the Chapter 11 Proceedings (the “US Case Website”) and reviewing certain information related to the Canadian Debtors;
- Corresponding with Bennett Jones regarding materials posted on the US Case Website;
- Preparing the Second Report of the Information Officer dated November 24, 2022 (the “Second Report”) regarding the recognition of certain orders (the “Recognized Orders”) made by the US Court in the Chapter 11 Proceedings;

- Reviewing the Recognized Orders, including:
 - the De Minimis Assets Order;
 - the Creditor Listing Order;
 - the Final Cash Collateral Order;
 - the Combined Wages Order; and
 - the Final Wages Order.
- Corresponding with Bennett Jones regarding the Second Report;
- Reviewing draft materials to be filed with the Canadian Court including draft versions of the:
 - Notice of Motion;
 - Affidavit of Andrew Harnes sworn November 23, 2022; and
 - Third Supplemental Order.
- Corresponding with Goodmans and Bennett Jones regarding the motion materials;
- Attending the Canadian Court hearing on November 29, 2022;
- Reviewing the Third Supplemental Order and the Endorsement dated November 29, 2022, of Chief Justice Morawetz;
- Reviewing draft versions of the purchase and sale agreement (the “Agreement”) between Tensor Limited and Endo International plc, among other parties;
- Corresponding with Goodmans and Bennett Jones regarding the Agreement;
- Reviewing draft versions of the Bidding Procedures Order;
- Attending virtual hearings of the US Court by phone on November 10 and December 15, 2022 (the “US Hearings”);
- Reviewing information uploaded to the US Case Website in advance of the US Hearings;
- Attending bi-weekly calls with the Canadian Debtors to obtain an update on their operations;
- Corresponding with creditors of the Canadian Debtors;
- Maintaining the Information Officer’s case website; and

- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees per attached time summary	CAD\$	36,148.75
HST		<u>4,699.34</u>
Total due	CAD\$	<u><u>40,848.09</u></u>

KSV Restructuring Inc.
Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
Time Summary
For the period November 1, 2022 - December 31, 2022

Personnel	Rate (\$)	Hours	Amount (\$)
Noah Goldstein	675.00	32.00	21,600.00
Jordan Wong	495.00	9.25	4,578.75
Nisan Thurairatnam	425.00	23.00	9,775.00
Other Staff and Administration		1.00	195.00
Total			<u>36,148.75</u>



Noah Goldstein
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kvsadvisory.com

February 10, 2023

DELIVERED BY EMAIL

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon, Suite 600
Montreal, QC H4M 2P2
Canada

Attention: Legal Billing

Dear Sirs:

Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the "Canadian Debtors")

Enclosed please find our invoice for services rendered for the month ending January 2023, in our capacity as Information Officer, appointed pursuant to an Order of the Ontario Superior Court of Justice (Commercial List) made on August 19th, 2022.

Should you have any questions regarding the enclosed, please contact the undersigned.

Yours very truly,

KSV RESTRUCTURING INC.
IN ITS CAPACITY AS INFORMATION OFFICER OF
THE CANADIAN DEBTORS
AND NOT IN ITS PERSONAL CAPACITY

Per: Noah Goldstein

NG: lq
Encl(s)



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INVOICE

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon Suite 600
Montreal, QC H4M 2P2
Canada

February 10, 2023

Invoice No: 2946
HST #: 818808768RT0001

**Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the "Canadian Debtors")**

For professional services rendered for the month ending January 2023 by KSV Restructuring Inc. ("KSV") in its capacity as Court-appointed Information Officer of the Canadian Debtors, including:

- Corresponding throughout the period with Goodmans LLP ("Goodmans"), Canadian counsel to the Canadian Debtors and its US parent and certain affiliates (collectively, the "Chapter 11 Debtors"), and Bennett Jones LLP ("Bennett Jones"), counsel to the Information Officer, regarding the proceedings commenced by the Chapter 11 Debtors pursuant to chapter 11 of title 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York (the "US Court") (the "Chapter 11 Proceedings");
- Monitoring the case management website maintained by Kroll Restructuring Administration LLC in respect of materials filed in the Chapter 11 Proceedings (the "US Case Website") and reviewing certain information related to the Canadian Debtors;
- Corresponding with Bennett Jones regarding materials posted on the US Case Website;

- Reviewing the following orders issued by the US Court:
 - the Sealing Order issued on January 23, 2023;
 - the Mediation Order issued on January 26, 2023;
 - Stipulation and Agreed Order issued on January 26, 2023;
- Corresponding with Bennett Jones regarding the above orders;
- Reviewing the Debtors Omnibus Reply dated January 16, 2023 in support of the Entry of the Bidding Procedures Order;
- Reviewing the Creditors' Committees' Claims Motion dated January 23, 2023;
- Corresponding with Bennett Jones regarding the Creditors' Committees' Claims motion materials;
- Attending a virtual hearing of the US Court on January 19, 2023 (the "US Hearing");
- Reviewing information uploaded to the US Case Website in advance of the US Hearing;
- Corresponding with creditors of the Canadian Debtors;
- Maintaining the Information Officer's case website; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees and disbursements per attached time summary	CAD\$	16,812.50
HST		<u>2,185.63</u>
Total due	CAD\$	<u><u>18,998.13</u></u>

KSV Restructuring Inc.
Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.

Time Summary

For the Month Ending January 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Noah Goldstein	700	9.75	6,825.00
Jordan Wong	525	4.25	2,231.25
Nisan Thurairatnam	425	18.25	7,756.25
Total fees		32.25	16,812.50
Out-of-pocket disbursements			-
Total fees and disbursements			<u>16,812.50</u>



Noah Goldstein
kvs advisory inc.

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ngoldstein@kvsadvisory.com
kvsadvisory.com

March 9, 2023

DELIVERED BY EMAIL

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon, Suite 600
Montreal, QC H4M 2P2
Canada

Attention: Legal Billing

Dear Sirs:

Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the "Canadian Debtors")

Enclosed please find our invoice for services rendered for the month ending February 2023, in our capacity as Information Officer, appointed pursuant to an Order of the Ontario Superior Court of Justice (Commercial List) made on August 19th, 2022.

Should you have any questions regarding the enclosed, please contact the undersigned.

Yours very truly,

KSV RESTRUCTURING INC.
IN ITS CAPACITY AS INFORMATION OFFICER OF
THE CANADIAN DEBTORS
AND NOT IN ITS PERSONAL CAPACITY

Per: Noah Goldstein

NG: lq
Encl(s)



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INVOICE

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon Suite 600
Montreal, QC H4M 2P2
Canada

March 9, 2023

Invoice No: 3007
HST #: 818808768RT0001

**Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the "Canadian Debtors")**

For professional services rendered for the month ending February 2023 by KSV Restructuring Inc. ("KSV") in its capacity as Court-appointed Information Officer of the Canadian Debtors, including:

- Corresponding throughout the period with Goodmans LLP ("Goodmans"), Canadian counsel to the Canadian Debtors and its US parent and certain affiliates (collectively, the "Chapter 11 Debtors"), and Bennett Jones LLP ("Bennett Jones"), counsel to the Information Officer, regarding the proceedings commenced by the Chapter 11 Debtors pursuant to chapter 11 of title 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York (the "US Court") (the "Chapter 11 Proceedings");
- Monitoring the case management website maintained by Kroll Restructuring Administration LLC in respect of materials filed in the Chapter 11 Proceedings (the "US Case Website") and reviewing certain information related to the Canadian Debtors;
- Corresponding with Bennett Jones regarding materials posted on the US Case Website;

- Reviewing the following proposed orders issued by the Debtors:
 - The Revised Bidding Procedures Order dated February 14, 2023;
 - The Second Revised Bidding Procedures Order dated February 27, 2023;
- Corresponding with Bennett Jones regarding the above proposed orders;
- Reviewing the following objections:
 - The Non-RSA First Lien Lenders; Supplemental Objection dated February 21, 2023;
 - The UCC Supplemental Objection dated February 22, 2023;
- Corresponding with Bennett Jones regarding the above objections;
- Reviewing the Debtors Supplemental Reply to the objections, dated February 27, 2023, in support of the Bidding Procedures Order;
- Corresponding with Bennett Jones regarding the above Supplemental Reply materials;
- Reviewing the Motion of Debtors for Entry of an Order Further Extending Time to Object to Dischargeability of Certain Debts dated February 16, 2023;
- Corresponding with Bennett Jones regarding the above Motion materials;
- Corresponding with creditors of the Canadian Debtors;
- Maintaining the Information Officer's case website; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees per attached time summary	CAD\$	10,440.00
Out-of-pocket disbursements		2,941.25
HST		<u>1,739.56</u>
Total due	CAD\$	<u><u>15,120.81</u></u>

KSV Restructuring Inc.
Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.

Time Summary

For the Month Ending February 28, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Noah Goldstein	700	10.20	7,140.00
Nisan Thura	425	7.50	3,187.50
Other Staff and administration	150 - 200	0.50	112.50
Total fees		18.20	10,440.00
Out-of-pocket disbursements (advertising)			2,941.25
Total fees and disbursements			13,381.25



Noah Goldstein
kvs advisory inc.

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April 17, 2023

DELIVERED BY EMAIL

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon, Suite 600
Montreal, QC H4M 2P2
Canada

Attention: Legal Billing

Dear Sirs:

Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the "Canadian Debtors")

Enclosed please find our invoice for services rendered for the month ending March 2023, in our capacity as Information Officer, appointed pursuant to an Order of the Ontario Superior Court of Justice (Commercial List) made on August 19th, 2022.

Should you have any questions regarding the enclosed, please contact the undersigned.

Yours very truly,

KSV RESTRUCTURING INC.
IN ITS CAPACITY AS INFORMATION OFFICER OF
THE CANADIAN DEBTORS
AND NOT IN ITS PERSONAL CAPACITY

Per: Noah Goldstein

NG: lq
Encl(s)



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INVOICE

Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.
100 Boul. Alexis-Nihon Suite 600
Montreal, QC H4M 2P2
Canada

April 17, 2023

Invoice No: 3082
HST #: 818808768RT0001

**Re: Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.
(jointly, the “Canadian Debtors”)**

For professional services rendered for the month ending March 2023 by KSV Restructuring Inc. (“KSV”) in its capacity as Court-appointed Information Officer of the Canadian Debtors, including:

- Corresponding throughout the period with Goodmans LLP (“Goodmans”), Canadian counsel to the Canadian Debtors and its US parent and certain affiliates (collectively, the “Chapter 11 Debtors”), and Bennett Jones LLP (“Bennett Jones”), counsel to the Information Officer, regarding the proceedings commenced by the Chapter 11 Debtors pursuant to chapter 11 of title 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York (the “US Court”) (the “Chapter 11 Proceedings”);
- Monitoring the case management website maintained by Kroll Restructuring Administration LLC in respect of materials filed in the Chapter 11 Proceedings (the “US Case Website”) and reviewing certain information related to the Canadian Debtors;
- Corresponding with Bennett Jones regarding materials posted on the US Case Website;

- Reviewing the following proposed orders issued by the Debtors:
 - the Third Revised Bidding Procedures Order dated March 14, 2023;
 - the Fourth Revised Bidding Procedures Order dated March 24, 2023;
- Corresponding with Bennett Jones regarding the above proposed orders;
- Reviewing the issued Order Further Extending Time To Object To Dischargeable Of Certain Debts, dated March 16, 2023;
- Corresponding with Bennett Jones regarding the above;
- Reviewing the following regarding objections:
 - Objection of Curia New Mexico, to the Notice of Rejection of Certain Executory Contracts dated March 2, 2023;
 - Notice of Chart Summarizing Outstanding Objections dated March 17, 2023;
 - Notice of Amended Chart Summarizing Outstanding Objections dated March 19, 2023;
- Corresponding with Bennett Jones regarding the above objections;
- Attending virtual hearings of the US Court by phone on March 7, March 13 and March 28, 2023
- Corresponding with creditors of the Canadian Debtors;
- Maintaining the Information Officer's case website; and
- To all other meetings, correspondence, etc. pertaining to this matter.

Total fees per attached time summary	CAD\$	16,337.50
HST		<u>2,123.88</u>
Total due	CAD\$	<u><u>18,461.38</u></u>

KSV Restructuring Inc.
Paladin Labs Inc. and Paladin Labs Canadian Holding Inc.

Time Summary

For the Month Ending March 31, 2023

Personnel	Rate (\$)	Hours	Amount (\$)
Noah Goldstein	700	12.30	8,610.00
Jordan Wong	525	3.75	1,968.75
Nisan Thurairatnam	425	13.55	5,758.75
Total fees		<u>29.60</u>	<u>16,337.50</u>
Out-of-pocket disbursements			-
Total fees and disbursements			<u><u>16,337.50</u></u>

THIS IS EXHIBIT "B" REFERRED TO IN THE
AFFIDAVIT OF NOAH GOLDSTEIN
SWORN BEFORE ME THIS 20th DAY OF APRIL, 2023



Catherine Anne Stuyck-Therault, a Commissioner, etc.,
Province of Ontario for KSV Advisory Inc. and
KSV Restructuring Inc.
Expires February 19, 2025

Paladin Labs Canadian Holding Inc. and Paladin Labs Inc.

Exhibit "B"

Schedule of Professionals' Time and Rates

Exhibit to the Affidavit of Noah Goldstein

Commencement of the Proceedings to March 31, 2023

Personnel	Title	Duties	Hours	Billing Rate (per hour)	Amount \$
Noah Goldstein	Managing Director	Overall responsibility	111.75	675-700	76,237.50
Jordan Wong	Director	All aspects of mandate	37.25	495-525	18,678.75
Nisan Thurairatnam	Manager	All aspects of mandate	62.30	425	26,477.50
Other staff and administrative			6.35	160-225	1,155.25
Total fees					<u>122,549.00</u>
Total hours					<u>217.65</u>
Average hourly rate					<u>\$ 563.06</u>

Appendix “B”

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF PALADIN LABS CANADIAN HOLDING INC. AND
PALADIN LABS INC.**

**APPLICATION OF PALADIN LABS INC. UNDER SECTION 46 OF THE *COMPANIES'*
CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED**

Applicant

**FEE AFFIDAVIT
(Sworn April 20, 2023)**

I, Sean Zweig, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a partner at Bennett Jones LLP ("**Bennett Jones**") who has had primary carriage of this file and, as such, have knowledge of the matters to which I hereinafter depose. Where I do not have personal knowledge of the matters discussed in this Affidavit, I have stated the source of my information and, in all cases, believe it to be true.
2. Bennett Jones is counsel to KSV Restructuring Inc., in its capacity as the Court-appointed information officer in the above-captioned proceedings (in such capacity, the "**Information Officer**").

3. Attached hereto as **Exhibit "A"** are copies of the Statements of Account rendered by Bennett Jones in connection with its role as counsel to the Information Officer for the period between August 17, 2022 and March 31, 2023. These Statements of Account have been redacted to address matters of confidentiality or privilege.

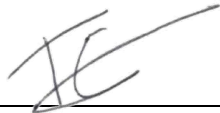
4. Attached hereto as **Exhibit "B"** is a table summarizing the aforementioned Statements of Account for the fees and disbursements incurred by Bennett Jones in connection with these proceedings for the period between August 17, 2022 and March 31, 2023.

5. Attached hereto as **Exhibit "C"** is a table detailing, among other things, the hourly rates and the time expended by the various professionals at Bennett Jones who have worked on this matter for the period between August 17, 2022 and March 31, 2023.

6. The total legal fees (exclusive of disbursements and general and harmonized sales taxes) billed by Bennett Jones for the aforementioned accounts to March 31, 2023, in connection with its role as counsel to the Information Officer, are \$166,042.00. To the best of my knowledge, the rates charged by Bennett Jones are comparable to the rates charged for the provision of services of a similar nature and complexity by other large legal firms in the Toronto market.

7. This Affidavit is made in support of approval of the fees and disbursements of Bennett Jones as counsel to the Information Officer, and for no other or improper purpose.

SWORN REMOTELY by Sean Zweig stated as being located in the City of Toronto, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on April 20th, 2023 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



THOMAS GRAY

Commissioner for Taking Affidavits
(or as may be)



SEAN ZWEIG

THIS IS **EXHIBIT "A"** REFERRED TO IN
THE AFFIDAVIT OF SEAN ZWEIG,
SWORN BEFORE ME THIS 20TH DAY OF APRIL, 2023.

A handwritten signature in black ink, appearing to be 'TG' with a long horizontal stroke extending to the right.

THOMAS GRAY

A Commissioner for taking Affidavits
(or as may be)



Bennett Jones

Bennett Jones LLP
Suite 3400
1 First Canadian Place
P.O. Box 130
Toronto, Ontario M5X 1A4

Endo International plc
First Floor, Minerva House
Simmonscourt Road, Ballsbridge
Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: September 20, 2022
Invoice: 1473258

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	25,957.50
Other Charges	\$	253.25
Total Due before Tax	\$	26,210.75
GST/HST	\$	3,407.40
Total Due in CAD	\$	29,618.15

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757



Date	Name	Description	Hours
17/08/22	Joshua Foster	Preparing for and participating in Interim Order hearing; Reviewing Interim Order endorsement; Corresponding with S. Zweig and KSV regarding First Day Motions to be recognized; Reviewing First Day Motions; Preparing summary of initial comments on same; Corresponding with S. Zweig regarding same; Reviewing docket; Corresponding with S. Zweig regarding same	6.00
17/08/22	Sean Zweig	Reviewing final application record and factum; Preparing for and attending Interim Order hearing; Follow-up correspondence; Reviewing relevant Chapter 11 First Day Motions, and discussing same; Reviewing Endorsement from Court	4.70
18/08/22	Joshua Foster	Reviewing proposed cash collateral order; Corresponding with counsel to the Applicant regarding service of application materials; Updating Service List; Providing same to KSV; Participating in hearing of first day motions/applications; Corresponding with S. Zweig regarding same	5.90
18/08/22	Sean Zweig	Correspondence with Goodmans; Reviewing issued Interim Order; Correspondence with J. Foster; Reviewing materials filed by Ad Hoc Group of Unsecured Noteholders; Discussions with N. Goldstein; Reviewing draft Service List; Attending Chapter 11 First Day Hearing; Follow-up correspondence	6.30
19/08/22	Joshua Foster	Reviewing docket and materials filed thereon; Circulating multiple updates regarding same to S. Zweig and KSV; Reviewing Supplemental Application Record of the Applicant; Preparing for and participating in hearing in respect of the proposed Initial Recognition Order and Supplemental Order	2.10
19/08/22	Sean Zweig	Various correspondence regarding status of U.S. Orders; Reviewing Supplemental Application Record; Reviewing further Affidavit; Preparing for and attending hearing; Follow-up correspondence	2.20
22/08/22	Joshua Foster	Reviewing updates to the docket	0.50
23/08/22	Joshua Foster	Reviewing additional materials filed on the docket; Reviewing filed copies of the Restructuring Support Agreement and the exhibits thereto, including the Restructuring Term Sheet, Trust Settlement Terms and Bidding Procedures; Updating the Service List;	4.10

Date	Name	Description	Hours
		Corresponding with counsel to the Applicant regarding same; Corresponding with KSV regarding same	
23/08/22	Sean Zweig	Various correspondence with stakeholders	0.30
24/08/22	Joshua Foster	Reviewing the docket for material case updates; Corresponding with N. Renner regarding the Initial Recognition Order hearing	0.20
24/08/22	Sean Zweig	Reviewing correspondence with stakeholder; Reviewing issued and entered Initial Recognition Order, and correspondence in connection with newspaper ad	0.30
25/08/22	Joshua Foster	Reviewing updates on case docket; Preparing summary note to S. Zweig, N. Goldstein and J. Wong regarding same	0.80
25/08/22	Sean Zweig	Call and emails with N. Goldstein regarding newspaper ad; Reviewing summary of filings made in Chapter 11 proceeding; Reviewing issued and entered Supplemental Order; Reviewing Application Record	0.80
26/08/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.10
29/08/22	Joshua Foster	Reviewing docket and materials filed thereon for material updates; Reviewing revised Service List; Corresponding with KSV and counsel to the Applicant regarding same	0.40
29/08/22	Sean Zweig	Correspondence with each of N. Goldstein and J. Foster	0.20
30/08/22	Joshua Foster	Reviewing docket and documents uploaded thereto for material updates; Updating Service List; Corresponding with counsel to the Applicant regarding same	0.20
30/08/22	Sean Zweig	Correspondence with KSV and A&M; Reviewing Endorsement from hearing	0.40
31/08/22	Joshua Foster	Reviewing docket and materials uploaded thereon for material updates; Revising Service List; Corresponding with KSV regarding same	0.80
31/08/22	Sean Zweig	Reviewing notice filed in Chapter 11 proceeding; Emails regarding same; Reviewing correspondence with CRA	0.30



Date	Name	Description	Hours
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Total Hours	36.60
Total Professional Services	\$ 25,957.50

Name	Hours	Rate
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Sean Zweig	15.50	\$ 960.00
Joshua Foster	21.10	\$ 525.00

Other Charges	Amount
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Printing	\$ 253.25
Total Other Charges	\$ 253.25
GST/HST	\$ 3,407.40
TOTAL DUE	\$ 29,618.15



Bennett Jones

Endo International plc
First Floor, Minerva House
Simmonscourt Road, Ballsbridge
Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: September 20, 2022
Invoice: 1473258

Remittance Statement

Professional Services	\$	25,957.50
Other Charges	\$	253.25
Total Due before Tax	\$	<u>26,210.75</u>
GST/HST	\$	3,407.40
Total Due in CAD	\$	<u>29,618.15</u>



Bennett Jones

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Toronto, Ontario M5X 1A4

Endo International plc
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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: October 11, 2022
Invoice: 1475953

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	12,795.00
Total Due before Tax	\$	12,795.00
GST/HST	\$	1,663.35
Total Due in CAD	\$	14,458.35

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757

October 11, 2022
Page 2Client:
Invoice No.:074735.00040
1475953

Date	Name	Description	Hours
01/09/22	Joshua Foster	Reviewing docket and documents uploaded thereto for material updates	0.40
02/09/22	Joshua Foster	Reviewing docket and documents thereon for material updates; Providing summary of same to KSV; Updating Service List	0.80
02/09/22	Sean Zweig	Reviewing notice filed in Chapter 11 proceeding; Emails regarding same; Reviewing correspondence with CRA	0.30
06/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.40
07/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary note to S. Zweig, N. Goldstein and J. Wong regarding same	1.20
07/09/22	Sean Zweig	Discussion with J. Foster regarding motion filed in the U.S., and considering same; Reviewing summary of Chapter 11 updates from J. Foster	0.80
08/09/22	Joshua Foster	Reviewing the docket and documents filed thereon for material updates	0.10
09/09/22	Joshua Foster	Reviewing inquiry received from K. Esaw regarding critical vendors; Preparing summary response to same; Corresponding with N. Goldstein regarding same	0.80
09/09/22	Sean Zweig	Reviewing inquiry from creditor, and correspondence regarding same	0.30
12/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary regarding same for N. Goldstein and J. Wong	1.20
12/09/22	Sean Zweig	Reviewing Chapter 11 update from J. Foster	0.60
13/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.30
14/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary of same for N. Goldstein and J. Wong	0.80
14/09/22	Sean Zweig	Reviewing update from J. Foster and certain filings in the U.S.	0.30
15/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.40

Date	Name	Description	Hours
16/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary note of same; Corresponding with N. Goldstein and J. Wong regarding same	0.80
16/09/22	Sean Zweig	Reviewing Chapter 11 update from J. Foster, along with relevant U.S. filings	0.40
19/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.40
23/09/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary of same for N. Goldstein and J. Wong	1.20
26/09/22	Joshua Foster	Reviewing the docket and materials filed thereon for material updates; Preparing summary of same for N. Goldstein and J. Wong	2.00
26/09/22	Sean Zweig	Reviewing update regarding Chapter 11 proceedings	0.50
27/09/22	Joshua Foster	Corresponding with counsel to the Applicants regarding final order hearing for certain of the First Day Motions	0.10
28/09/22	Joshua Foster	Participating in lengthy final hearing on certain of the Debtors' First Day Motions	2.50
28/09/22	Sean Zweig	Preparing for and attending U.S. hearing	2.60
30/09/22	Sean Zweig	Discussion with N. Goldstein regarding upcoming hearing and next steps	0.20

Total Hours	19.40
Total Professional Services	\$ 12,795.00

Name	Hours	Rate
Sean Zweig	6.00	\$ 960.00
Joshua Foster	13.40	\$ 525.00
GST/HST		\$ 1,663.35
TOTAL DUE		\$ 14,458.35



Bennett Jones

Endo International plc
First Floor, Minerva House
Simmonscourt Road, Ballsbridge
Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: October 11, 2022
Invoice: 1475953

Remittance Statement

Professional Services	\$	12,795.00
Total Due before Tax	\$	<u>12,795.00</u>
GST/HST	\$	1,663.35
Total Due in CAD	\$	<u>14,458.35</u>



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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: November 4, 2022
Invoice: 1480407

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	27,973.50
Total Due before Tax	\$	27,973.50
GST/HST	\$	3,636.56
Total Due in CAD	\$	31,610.06

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757

Date	Name	Description	Hours
02/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary note regarding same	0.50
03/10/22	Joshua Foster	Providing summary of updates to the docket to N. Goldstein and J. Wong; Reviewing docket and documents filed thereon for material updates; Participating in call with S. Zweig, N. Goldstein and J. Wong regarding first report to be drafted; Reviewing precedents of same; Reviewing and providing comments on draft Supplemental Order; Corresponding with S. Zweig regarding same	2.20
03/10/22	Sean Zweig	Reviewing update on Chapter 11 proceeding; Call with KSV and J. Foster; Reviewing and commenting on draft Second Supplemental Order; Correspondence with J. Foster regarding same	0.90
04/10/22	Joshua Foster	Corresponding with N. Goldstein and J. Wong regarding draft Second Supplemental Order; Corresponding with the Applicant's counsel regarding same; Reviewing docket and documents filed thereon for material updates	0.50
04/10/22	Sean Zweig	Correspondence regarding Second Supplemental Order	0.20
05/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Beginning to review and provide comments on draft Affidavit in support of Second Supplemental Order	3.50
05/10/22	Sean Zweig	Preliminary review of draft Affidavit in support of Second Supplemental Order	0.50
06/10/22	Joshua Foster	Finalizing review and mark-up of draft Second Vas Affidavit; Corresponding with S. Zweig regarding same; Corresponding with N. Goldstein and J. Wong regarding same; Corresponding with counsel to the Applicant regarding same; Reviewing docket and documents filed thereon for material updates; Reviewing and providing comments on further revised draft of Second Vas Affidavit; Corresponding with S. Zweig regarding same; Corresponding with counsel to the Applicant regarding same	3.20
06/10/22	Sean Zweig	Reviewing and commenting on draft Affidavit; Discussing same with each of N. Goldstein and J. Foster; Reviewing revised Affidavit; Correspondence with Goodmans; Reviewing J.	1.30

Date	Name	Description	Hours
		Foster's comments on revised Affidavit, and discussing same	
07/10/22	Joshua Foster	Updating Service List; Corresponding with counsel to the Applicant and J. Wong regarding same; Updating draft Affidavit of Service; Reviewing and providing comments on draft First Report of the Information Officer; Corresponding with S. Zweig regarding same; Reviewing docket and documents filed thereon for material updates	4.70
07/10/22	Sean Zweig	Reviewing motion record served; Reviewing and commenting on draft Information Officer's Report	1.50
08/10/22	Joshua Foster	Reviewing and revising draft First Report of the Information Officer; Corresponding with KSV and S. Zweig regarding same	0.90
08/10/22	Sean Zweig	Reviewing N. Goldstein's comments on Report; Discussing same with J. Foster	0.30
09/10/22	Joshua Foster	Reviewing and revising draft First Report; Corresponding with counsel to the Applicant regarding same; Reviewing comments received from counsel to the Applicant; Corresponding with S. Zweig and KSV regarding same; Incorporating comments received from counsel to the Applicant	0.90
09/10/22	Sean Zweig	Reviewing revised Report, and Goodmans' comments on same; Discussing same with J. Foster and reviewing further revised draft	0.60
10/10/22	Joshua Foster	Finalizing First Report; Corresponding with KSV regarding same; Serving First Report; Finalizing Affidavit of Service and swearing same; Filing First Report and uploading same to CaseLines; Corresponding with the Commercial List regarding same	1.10
10/10/22	Sean Zweig	Finalizing Report	0.30
11/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
12/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing and providing update in connection with same to N. Goldstein and J. Wong; Corresponding with counsel to the Applicant regarding the Applicant's motion for the proposed Second Supplemental Order; Preparing proposed response to co-counsel to the Debtors	2.20

Date	Name	Description	Hours
		regarding the Debtors' retention and payment of ordinary-course professionals; Corresponding with S. Zweig regarding same	
12/10/22	Sean Zweig	[REDACTED]; Reviewing update from J. Foster regarding Chapter 11 proceeding and reviewing certain of the filings	1.60
13/10/22	Joshua Foster	Corresponding with counsel to the Applicant regarding U.S. Bankruptcy Court Omnibus Hearing; Participating in Omnibus Hearing in the U.S. Bankruptcy Court; Reviewing proposed revised form of Second Supplemental Order; Corresponding with N. Goldstein and J. Wong regarding same; Corresponding with counsel to the Applicant regarding same; Preparing for and participating in hearing for Second Supplemental Order; Reviewing docket and documents filed thereon for material updates; Beginning to draft summary of same for N. Goldstein and J. Wong	7.40
13/10/22	Sean Zweig	Reviewing proposed revised Order; Reviewing supplemental materials filed by Foreign Representative; Reviewing update from J. Foster regarding U.S. and Canadian Court hearings; Discussing and considering issue raised by Canadian Court	1.30
14/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.30
15/10/22	Joshua Foster	Reviewing numerous materials filed on the docket in connection with the Debtors' Cash Collateral Motion; Preparing summary of same; Corresponding with N. Goldstein and J. Wong regarding same	3.00
15/10/22	Sean Zweig	Reviewing update from J. Foster on Chapter 11 proceedings and reviewing certain of the filings	1.50
16/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
17/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Reviewing granted Second Supplemental Order and accompanying endorsement of Chief Justice Morawetz; Participating in call with B. Wiffen regarding the Second Supplemental Order hearing; Preparing and providing note to S. Zweig regarding same	1.20

Date	Name	Description	Hours
17/10/22	Sean Zweig	Discussion with J. Foster regarding claims issue, and considering same; Reviewing Order and Endorsement granted	0.50
18/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.10
19/10/22	Joshua Foster	Reviewing docket and documents filed thereon; Attending the Debtors' Cash Collateral Motion	0.90
20/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with counsel to the Applicant regarding updates to the Service List; Corresponding with J. Wong regarding same	0.20
24/10/22	Sean Zweig	Reviewing draft email to governments in B.C. class action	0.10
25/10/22	Joshua Foster	Reviewing the docket and documents filed thereon for material updates	0.30
26/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
28/10/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20

Total Hours	44.50
Total Professional Services	\$ 27,973.50

Name	Hours	Rate
Sean Zweig	10.60	\$ 960.00
Joshua Foster	33.90	\$ 525.00
	GST/HST	\$ 3,636.56
	TOTAL DUE	\$ 31,610.06



Bennett Jones

Endo International plc
First Floor, Minerva House
Simmonscourt Road, Ballsbridge
Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: November 4, 2022
Invoice: 1480407

Remittance Statement

Professional Services	\$	27,973.50
Total Due before Tax	\$	<u>27,973.50</u>
GST/HST	\$	3,636.56
Total Due in CAD	\$	<u>31,610.06</u>



Bennett Jones

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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: December 20, 2022
Invoice: 1489621

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	27,776.50
Other Charges	\$	41.00
Total Due before Tax	\$	27,817.50
GST/HST	\$	3,616.28
Total Due in CAD	\$	31,433.78

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757

Date	Name	Description	Hours
03/11/22	Sean Zweig	Reviewing email from counsel to Province of British Columbia, and considering same; Correspondence with N. Goldstein and J. Foster regarding same	0.40
07/11/22	Ilan Ishai	Exchanging email correspondence with S. Zweig and J. Foster [REDACTED]	0.40
07/11/22	Sean Zweig	Reviewing email from B. Wiffen, [REDACTED] Correspondence regarding same	0.50
08/11/22	Joshua Foster	Preparing for and participating in call with I. Ishai regarding [REDACTED]; Preparing summary note to S. Zweig regarding same	1.30
08/11/22	Ilan Ishai	Reviewing draft orders and background documents relating [REDACTED] Call with J. Foster regarding impact [REDACTED] and email correspondence with S. Zweig and J. Foster regarding same	0.40
08/11/22	Sean Zweig	Correspondence regarding [REDACTED]	0.30
09/11/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing and providing note to N. Goldstein and J. Wong regarding Omnibus Hearing scheduled for November 10, 2022	0.30
09/11/22	Sean Zweig	Further correspondence regarding [REDACTED]; Reviewing Notice of Agenda for upcoming hearing; Discussion with J. Foster	0.40
10/11/22	Joshua Foster	Attending Omnibus Hearing	2.90
10/11/22	Sean Zweig	Attending Chapter 11 hearing	2.90
11/11/22	Joshua Foster	Corresponding with N. Thurairatnam regarding docket updates and Omnibus Hearing	0.40
14/11/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with N. Thurairatnam regarding same	0.30
15/11/22	Sean Zweig	Correspondence with B. Wiffen regarding proposed next steps in recognition proceeding	0.10

Date	Name	Description	Hours
16/11/22	Joshua Foster	Reviewing draft Asset Purchase Agreement and proposing revisions to same; Corresponding with S. Zweig regarding same; Corresponding with counsel to the Applicants regarding same	3.90
16/11/22	Kris Hanc	Reviewing purchase agreement; Emails regarding same	2.80
16/11/22	Sean Zweig	Reviewing and commenting on draft APA; Discussions regarding same; Reviewing draft Bidding Procedures Order and emails regarding same	3.00
17/11/22	Joshua Foster	Reviewing and providing comments on draft Third Supplemental Order and Affidavit in support thereof; Corresponding with S. Zweig regarding same	2.60
17/11/22	Sean Zweig	Reviewing and commenting on draft Affidavit and Order; Reviewing J. Foster's comments on same and discussing same	0.80
18/11/22	Joshua Foster	Corresponding with KSV regarding draft Third Supplemental Order and draft Affidavit	0.10
18/11/22	Sean Zweig	Reviewing updated comments on motion materials; Correspondence with KSV regarding same	0.30
19/11/22	Joshua Foster	Corresponding with counsel to the Applicant regarding draft Third Supplemental Order and corresponding draft Affidavit; Reviewing docket and documents filed thereon for material updates	0.60
19/11/22	Sean Zweig	Correspondence regarding draft Affidavit and Order, and reviewing cumulative comments on same	0.40
20/11/22	Joshua Foster	Reviewing revised form of Asset Purchase Agreement; Corresponding with S. Zweig regarding same	0.50
20/11/22	Sean Zweig	Reviewing and commenting on revised credit bid APA	1.00
21/11/22	Joshua Foster	Reviewing revised form of Asset Purchase Agreement; Corresponding with S. Zweig regarding same; Corresponding with counsel to the Applicant regarding same	0.20

Date	Name	Description	Hours
21/11/22	Sean Zweig	Various correspondence regarding revised APA	0.30
22/11/22	Joshua Foster	Reviewing and providing comments on revised draft Affidavit; Corresponding with S. Zweig and KSV regarding same; Corresponding with counsel to the Applicant regarding same; Reviewing and revising draft Second Report of the Information Officer; Corresponding with S. Zweig and KSV regarding same	4.80
22/11/22	Sean Zweig	Reviewing and commenting on revised draft of Affidavit from Goodmans; Correspondence with J. Foster and KSV regarding same; Reviewing and commenting on draft Second Report; Reviewing further revised draft of Affidavit from Goodmans	2.10
23/11/22	Joshua Foster	Corresponding with counsel to the Applicant regarding the draft Second Report of the Information Officer; Reviewing revisions proposed by same; Corresponding with S. Zweig regarding same	0.30
23/11/22	Sean Zweig	Discussion with N. Goldstein regarding draft Report; Reviewing motion record served; Reviewing Goodmans' comments on draft Report; Discussing same with J. Foster	0.90
24/11/22	Joshua Foster	Finalizing Second Report of the Information Officer; Corresponding with KSV regarding same; Serving Second Report of the Information Officer; Drafting and swearing Affidavit of Service; Filing Affidavit of Service and Second Report of the Information Officer and uploading same to CaseLines	1.50
28/11/22	Joshua Foster	Corresponding with S. Zweig regarding hearing seeking Third Supplemental Order	0.20
29/11/22	Joshua Foster	Preparing for and participating in motion for Third Supplemental Order	0.60
29/11/22	Sean Zweig	Preparing for and attending hearing; Reviewing Endorsement	0.80

Total Hours	38.30
Total Professional Services	\$ 27,776.50

Name	Hours	Rate
Kris Hanc	2.80 \$	975.00
Sean Zweig	14.20 \$	960.00
Ilan Ishai	0.80 \$	815.00



Name	Hours	Rate
Joshua Foster	20.50 \$	525.00

Other Charges	Amount
Printing	\$ 41.00
Total Other Charges	\$ 41.00
GST/HST	\$ 3,616.28
TOTAL DUE	\$ 31,433.78



Bennett Jones

Endo International plc
First Floor, Minerva House
Simmonscourt Road, Ballsbridge
Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: December 20, 2022
Invoice: 1489621

Remittance Statement

Professional Services	\$	27,776.50
Other Charges	\$	41.00
Total Due before Tax	\$	<u>27,817.50</u>
GST/HST	\$	3,616.28
Total Due in CAD	\$	<u>31,433.78</u>



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P.O. Box 130
Toronto, Ontario M5X 1A4

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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: December 31, 2022
Invoice: 1492868

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	7,410.00
Total Due before Tax	\$	7,410.00
GST/HST	\$	963.30
Total Due in CAD	\$	8,373.30

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757

Date	Name	Description	Hours
01/12/22	Joshua Foster	Reviewing correspondence from Quebec class-counsel; Reviewing docket in connection with same; Beginning to prepare response to Quebec class-counsel	0.50
02/12/22	Joshua Foster	Corresponding with claims and noticing agent regarding adding parties to email service list; Finalizing draft response to Quebec class counsel; Corresponding with S. Zweig regarding same	0.30
02/12/22	Sean Zweig	Reviewing correspondence	0.20
05/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
06/12/22	Joshua Foster	Reviewing various materials filed in connection with the Debtors' Bidding Procedures Motion, including objections thereto; Preparing summary of same for N. Goldstein and J. Wong; Corresponding with N. Goldstein regarding same	2.80
06/12/22	Sean Zweig	Discussion with J. Foster regarding Chapter 11 update; Reviewing detailed email and relevant Chapter 11 pleadings regarding same	1.70
07/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with N. Goldstein, J. Wong and S. Zweig regarding same; Corresponding with the Applicant's counsel regarding proposed motion date	0.50
07/12/22	Sean Zweig	Reviewing information regarding proposed intercompany transfers, and considering same; Correspondence with J. Foster and KSV	1.00
08/12/22	Joshua Foster	Corresponding with counsel to the Applicant regarding motion date to be vacated and potential new motion dates; Corresponding with N. Goldstein, J. Wong and S. Zweig regarding same; Reviewing docket and documents filed thereon for material updates	0.20
08/12/22	Sean Zweig	Correspondence regarding update and next steps	0.20
09/12/22	Sean Zweig	Reviewing email from B. Wiffen regarding intercompany transfers	0.10
10/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
12/12/22	Joshua Foster	Reviewing docket and documents filed thereon for	0.10

Date	Name	Description	Hours
		material updates	
14/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing and sending update to N. Goldstein and J. Wong regarding omnibus hearing	0.50
14/12/22	Sean Zweig	Reviewing update regarding Chapter 11 proceeding	0.20
15/12/22	Joshua Foster	Participating in Omnibus Hearing	0.60
15/12/22	Sean Zweig	Attending Chapter 11 hearing	0.60
22/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
23/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.10
27/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.10
28/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.10
29/12/22	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.40
Total Hours			10.80
Total Professional Services			\$ 7,410.00

Name	Hours	Rate
Sean Zweig	4.00	\$ 960.00
Joshua Foster	6.80	\$ 525.00
GST/HST		\$ 963.30
TOTAL DUE		\$ <u>8,373.30</u>



Bennett Jones

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First Floor, Minerva House
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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: December 31, 2022
Invoice: 1492868

Remittance Statement

Professional Services	\$	7,410.00
Total Due before Tax	\$	<u>7,410.00</u>
GST/HST	\$	963.30
Total Due in CAD	\$	<u><u>8,373.30</u></u>



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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: February 7, 2023
Invoice: 1498157

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	28,224.00
Total Due before Tax	\$	28,224.00
GST/HST	\$	3,669.12
Total Due in CAD	\$	31,893.12

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757

Date	Name	Description	Hours
02/01/23	Joshua Foster	Reviewing docket for material updates	0.10
03/01/23	Joshua Foster	Reviewing docket for material updates	0.10
04/01/23	Joshua Foster	Reviewing docket for material updates	0.10
05/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
06/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.80
06/01/23	Sean Zweig	Reviewing certain objections filed in Chapter 11 proceedings regarding Bidding Procedures Motion	0.30
08/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.60
10/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates, including with respect to objections to the Debtors' bidding procedures motion; Beginning to draft summary of same	1.90
11/01/23	Joshua Foster	Reviewing various objections and related materials filed in connection with the Debtors' bidding procedures motion and bar date motion; Continuing to draft summary of same	3.50
12/01/23	Joshua Foster	Continuing to review various objections and reservations of rights filed on the docket in connection with the Debtors' bidding procedures motion, bar date motion and motion to assume certain fee agreements; Continuing to draft summary of same	3.50
13/01/23	Joshua Foster	Finalizing summary of various objections and reservations of rights filed in connection with the Debtors' January 19 Omnibus Hearing; Corresponding with N. Goldstein and J. Wong regarding same; Reviewing additional materials filed on the docket	1.80
13/01/23	Sean Zweig	Reviewing detailed summary email from J. Foster regarding Chapter 11 updates, and reviewing certain of the background documents attached	2.10
14/01/23	Joshua Foster	Reviewing docket for material updates	0.10
16/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates, including the Ad Hoc First Lien Group's and the Debtors' omnibus replies to the	2.70

Date	Name	Description	Hours
		objections filed to the Bidding Procedures Motion; Reviewing Omnibus Notice of Adjournment; Corresponding with N. Goldstein and J. Wong regarding same; Corresponding with B. Wiffen regarding same and the potential rescheduling of the Applicant's January 30 motion	
16/01/23	Sean Zweig	Reviewing adjournment notice; Correspondence with J. Foster and KSV regarding same and related matters	0.30
17/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with N. Goldstein and J. Wong regarding Notice of Agenda filed	0.40
17/01/23	Sean Zweig	Reviewing correspondence with Court regarding hearing; Reviewing correspondence with CPC Healthcare; Reviewing Notice of Agenda for Chapter 11 hearing	0.40
18/01/23	Joshua Foster	Reviewing Amended Notice of Agenda; Corresponding with N. Goldstein and J. Wong regarding same	0.20
18/01/23	Sean Zweig	Reviewing Amended Notice of Hearing; Discussions with each of J. Foster and N. Goldstein	0.40
19/01/23	Joshua Foster	Reviewing docket for material updates; Attending omnibus hearing	1.20
19/01/23	Sean Zweig	Preparing for and attending Chapter 11 Omnibus Hearing	2.00
20/01/23	Joshua Foster	Participating in call with S. Zweig regarding questions raised by prospective service provider; Reviewing Orders granted in both the Chapter 11 proceedings and the Canadian recognition proceedings in connection with same; Conducting research in connection with same and the Bankruptcy Code; Preparing draft note to prospective service provider; Corresponding with S. Zweig regarding same	5.20
20/01/23	Sean Zweig	Call with supplier and counsel; Follow-up discussions with each of N. Goldstein and J. Foster; Considering issues; Reviewing correspondence regarding same	1.50
21/01/23	Sean Zweig	Reviewing proposed email from J. Foster to supplier's counsel; Revising same; Emails with N. Goldstein regarding same	1.20

Date	Name	Description	Hours
23/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.50
24/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	1.90
25/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.10
26/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.40
27/01/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary note to N. Goldstein and J. Wong regarding same	1.00
27/01/23	Sean Zweig	Reviewing update from J. Foster regarding Chapter 11 developments; Detailed review of certain U.S. materials	2.60
29/01/23	Sean Zweig	Reviewing analysis from KSV regarding certain recent developments	0.40
30/01/23	Joshua Foster	Reviewing docket for material updates	0.10
Total Hours			37.60
Total Professional Services			\$ 28,224.00

Name	Hours	Rate
Sean Zweig	11.20	\$ 1,035.00
Joshua Foster	26.40	\$ 630.00
	GST/HST	\$ 3,669.12
	TOTAL DUE	\$ 31,893.12



Bennett Jones

Endo International plc
First Floor, Minerva House
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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: February 7, 2023
Invoice: 1498157

Remittance Statement

Professional Services	\$	28,224.00
Total Due before Tax	\$	<u>28,224.00</u>
GST/HST	\$	3,669.12
Total Due in CAD	\$	<u>31,893.12</u>



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Re: Paladin Labs
Our File Number: 074735.00040

Date: March 3, 2023
Invoice: 1501960

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	11,731.50
Total Due before Tax	\$	11,731.50
GST/HST	\$	1,525.10
Total Due in CAD	\$	13,256.60

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757

March 3, 2023
Page 2Client:
Invoice No.:074735.00040
1501960

Date	Name	Description	Hours
01/02/23	Joshua Foster	Reviewing docket for material updates	0.10
02/02/23	Sean Zweig	Reviewing correspondence regarding supplier issue; Discussing same with KSV	0.60
05/02/23	Joshua Foster	Reviewing docket for material updates	0.10
06/02/23	Joshua Foster	Reviewing docket for material updates	0.10
07/02/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.10
08/02/23	Sean Zweig	Reviewing email from B. Wiffen, and considering same; Discussing same with N. Goldstein	1.30
09/02/23	Joshua Foster	Preparing for and participating in call with counsel to the Applicant regarding [REDACTED]; Preparing summary note to S. Zweig regarding same; Corresponding with N. Goldstein regarding same; Corresponding with counsel to the Applicant regarding same	1.50
09/02/23	Sean Zweig	Various correspondence in connection with [REDACTED], and considering same	0.70
13/02/23	Joshua Foster	Reviewing docket for material updates	0.10
14/02/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.40
15/02/23	Joshua Foster	Reviewing docket and documents filed thereon, including updated bidding procedures, for material updates	2.00
17/02/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
18/02/23	Joshua Foster	Reviewing docket for material updates	0.10
20/02/23	Joshua Foster	Reviewing docket for material updates	0.10
21/02/23	Joshua Foster	Reviewing docket for material updates	0.10
22/02/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.30
23/02/23	Joshua Foster	Corresponding with S. Zweig regarding status of Chapter 11 proceedings and docket updates; Reviewing docket and documents filed thereon for material updates	0.50



Date	Name	Description	Hours
23/02/23	Sean Zweig	Discussion with J. Foster regarding recent developments in Chapter 11 proceeding, and reviewing certain material documents filed	1.40
24/02/23	Joshua Foster	Reviewing docket for material updates	0.10
27/02/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Drafting detailed summary note regarding same; Corresponding with N. Goldstein and J. Wong regarding same	2.60
27/02/23	Sean Zweig	Reviewing update email from J. Foster regarding recent developments in Chapter 11 proceeding, and reviewing certain material documents filed	2.10
28/02/23	Joshua Foster	Reviewing docket for material updates; Corresponding with KSV	0.20
Total Hours			14.70
Total Professional Services			\$ 11,731.50

Name	Hours	Rate
Sean Zweig	6.10	\$ 1,035.00
Joshua Foster	8.60	\$ 630.00
GST/HST		\$ 1,525.10
TOTAL DUE		\$ <u>13,256.60</u>



Bennett Jones

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First Floor, Minerva House
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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: March 3, 2023
Invoice: 1501960

Remittance Statement

Professional Services	\$	11,731.50
Total Due before Tax	\$	<u>11,731.50</u>
GST/HST	\$	1,525.10
Total Due in CAD	\$	<u><u>13,256.60</u></u>



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Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: April 11, 2023
Invoice: 1507488

PROFESSIONAL SERVICES RENDERED in conjunction with the above noted matter:

Professional Services	\$	24,174.00
Total Due before Tax	\$	24,174.00
GST/HST	\$	3,142.62
Total Due in CAD	\$	27,316.62

Due upon receipt. Bennett Jones reserves the right to charge interest at a rate not greater than 12% per annum on outstanding invoices over 30 days. We collect, use and disclose information pursuant to our Privacy Policies. For further information visit our website at www.bennettjones.com. GST/HST number: 119346757



Date	Name	Description	Hours
01/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with KSV and S. Zweig regarding Notice of Agenda and the adjournment of certain motions; Circulating hearing details	0.30
01/03/23	Sean Zweig	Reviewing Notice of Agenda, and emails regarding same	0.10
02/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with N. Goldstein, J. Wong, S. Zweig and N. Thurairatnam regarding same	0.80
02/03/23	Sean Zweig	Various correspondence regarding Chapter 11 hearing; Discussions with each of N. Goldstein and J. Foster	0.50
03/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with S. Zweig and KSV regarding same; Joining multiple adjourned hearings; Corresponding with KSV regarding same	1.20
03/03/23	Sean Zweig	Various correspondence in connection with Chapter 11 hearing	0.30
04/03/23	Joshua Foster	Reviewing docket for material updates	0.10
06/03/23	Joshua Foster	Reviewing docket for material updates	0.10
07/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with S. Zweig and the Information Officer regarding Status Conference; Corresponding with counsel to the Applicant regarding same; Attending Status Conference; Preparing summary note in connection with same; Reviewing [REDACTED]; [REDACTED]; Corresponding with S. Zweig regarding same	2.30
07/03/23	Sean Zweig	Attending Chapter 11 status hearing; Considering issues, and discussing same internally	2.10
08/03/23	Joshua Foster	Reviewing docket and documents filed thereon	0.10
09/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
10/03/23	Joshua Foster	Reviewing docket and documents filed thereon for	0.20

Date	Name	Description	Hours
		material updates	
12/03/23	Joshua Foster	Reviewing docket for material updates	0.10
13/03/23	Joshua Foster	Participating in Status Conference; Preparing and providing update to KSV regarding same	1.10
13/03/23	Sean Zweig	Attending Chapter 11 status conference; Discussions regarding same and next steps with each of J. Foster and KSV	1.50
14/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.20
15/03/23	Joshua Foster	Reviewing docket for material updates	0.10
16/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.50
17/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates	0.70
21/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Corresponding with S. Zweig and KSV regarding same	0.60
21/03/23	Sean Zweig	Reviewing and considering materials filed in Chapter 11 proceeding	0.70
22/03/23	Joshua Foster	Reviewing docket for material updates; Corresponding with S. Zweig and KSV regarding adjournment of omnibus hearing	0.20
22/03/23	Sean Zweig	Reviewing Notice of Adjournment	0.10
23/03/23	Joshua Foster	Reviewing docket for material updates	0.10
27/03/23	Joshua Foster	Reviewing docket and documents filed thereon for material updates; Preparing summary note to KSV regarding same	1.00
27/03/23	Sean Zweig	Reviewing further materials filed in Chapter 11 proceeding	2.70
28/03/23	Joshua Foster	Participating in the Debtors Omnibus Hearing for the Bidding Procedures Motion, Exclusivity Motion and Bar Date Motion; Corresponding with KSV regarding same	5.80
28/03/23	Sean Zweig	Attending Chapter 11 hearing; Correspondence regarding same	5.80



Date	Name	Description	Hours
		Total Hours	29.50
		Total Professional Services	\$ 24,174.00

Name	Hours	Rate
Sean Zweig	13.80	\$ 1,035.00
Joshua Foster	15.70	\$ 630.00
	GST/HST	\$ 3,142.62
	TOTAL DUE	\$ 27,316.62



Bennett Jones

Endo International plc
First Floor, Minerva House
Simmonscourt Road, Ballsbridge
Dublin, 4, Ireland

Re: Paladin Labs
Our File Number: 074735.00040

Date: April 11, 2023
Invoice: 1507488

Remittance Statement

Professional Services	\$	24,174.00
Total Due before Tax	\$	<u>24,174.00</u>
GST/HST	\$	3,142.62
Total Due in CAD	\$	<u>27,316.62</u>

THIS IS **EXHIBIT "B"** REFERRED TO IN
THE AFFIDAVIT OF SEAN ZWEIG,
SWORN BEFORE ME THIS 20TH DAY OF APRIL, 2023.

A handwritten signature in black ink, appearing to be 'TG' with a long horizontal stroke extending to the right.

THOMAS GRAY

A Commissioner for taking Affidavits
(or as may be)

Invoice #	Period Ended	Date of Account	Fees	Disbursements	GST/HST	Total
Invoice # 1	August 31, 2022	September 20, 2022	\$25,957.50	\$253.25	\$3,407.40	\$29,618.15
Invoice # 2	September 30, 2022	October 11, 2022	\$12,795.00	\$0.00	\$1,663.35	\$14,458.35
Invoice # 3	October 28, 2022	November 4, 2022	\$27,973.50	\$0.00	\$3,636.56	\$31,610.06
Invoice # 4	November 29, 2022	December 20, 2022	\$27,776.50	\$41.00	\$3,616.28	\$31,433.78
Invoice # 5	December 29, 2022	December 31, 2022	\$7,410.00	\$0.00	\$963.30	\$8,373.30
Invoice # 6	January 30, 2023	February 7, 2023	\$28,224.00	\$0.00	\$3,669.12	\$31,893.12
Invoice # 7	February 28, 2023	March 3, 2023	\$11,731.50	\$0.00	\$1,525.10	\$13,256.60
Invoice # 8	March 28, 2023	April 11, 2023	\$24,174.00	\$0.00	\$3,142.62	\$27,316.62
Total			\$166,042.00	\$294.25	\$21,623.73	\$187,959.98

THIS IS **EXHIBIT "C"** REFERRED TO IN
THE AFFIDAVIT OF SEAN ZWEIG,
SWORN BEFORE ME THIS 20TH DAY OF APRIL, 2023.

A handwritten signature in black ink, appearing to read 'TG', with a long horizontal stroke extending to the right.

THOMAS GRAY

A Commissioner for taking Affidavits
(or as may be)

Timekeeper	Year of Call	Hourly Rate	Total Hours	Total Fees
K. Hanc	2007	\$975	2.8	\$2,730.00
S. Zweig	2009	\$960	50.3	\$48,288.00
		\$1,035	31.1	\$32,188.50
I. Ishai	2011	\$815	0.8	\$652.00
J. Foster	2020	\$525	95.7	\$50,242.50
		\$630	50.7	\$31,941.00
Total			231.4	\$166,042.00

Average hourly rate = \$717.55¹

¹ Exclusive of applicable general and harmonized sales taxes.

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF PALADIN LABS CANADIAN HOLDING INC. AND PALADIN LABS INC.

APPLICATION OF PALADIN LABS INC. UNDER SECTION 46 OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

Applicant

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceeding commenced at Toronto

FEE AFFIDAVIT

BENNETT JONES LLP

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Suite 3400, P.O. Box 130
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M5X 1A4

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Joshua Foster (LSO# 79447K)

Tel: (416) 777-7906

Email: fosterj@bennettjones.com

Lawyers for KSV Restructuring Inc., solely in its capacity as the Court-appointed Information Officer and not in its personal or corporate capacity