

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

In re:	}	Chapter 11
	}	
MALLINCKRODT PLC	}	Case No. 20-12522 (JTD)
	}	
Reorganized Debtor.	}	Re: D.I. 8969

**ORDER SETTING A JUNE 15, 2025 BAR DATE  
FOR NON-FUTURE NON-NAS PERSONAL INJURY CLAIMS**

Upon the Motion (the “Motion”)<sup>1</sup> of the Personal Injury Trustee, Edgar C. Gentle, III, by and through his Counsel, for the entry of an Order, pursuant to Bankruptcy Code sections 501, 502 and 1111, Bankruptcy Rules 2002, 3001, 3002, 3003, 3005, 5005 and 9008, and Local Rule 2002-1, (i) determining a bar date for Non-Future Non-NAS Personal Injury Claims as June 15, 2025; and (ii) approving the form and manner of Notice thereof, all as set forth in this Order; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. §157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§1408 and 1409; and due and proper notice of the Motion having been provided to the Noticed Parties, and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion and held a hearing to consider the relief requested therein (the “Hearing”); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted in this order; and the Court having determined that the relief requested is in the best interest of the Debtors, their estates, creditors, and all parties in interest; and the publication of the requested relief in the Motion and this Order

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<sup>1</sup> Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Motion.

helps afford impacted parties with reasonable notice thereof; and upon all of the proceedings had before the Court and after due deliberation and good and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is **GRANTED** as provided therein.
2. The Bar Date for Non-Future Non-NAS Personal Injury Claims is hereby set as June 15, 2025 with this date being referred to as the Bar Date, and this Order being referred to as the Bar Date Order herein.
3. The Trustee shall provide notice of the Bar Date for Non-Future Non-NAS Personal Injury Claims as set forth herein.
4. The Trustee is authorized and directed to post the Bar Date Notice substantially in the form of Exhibit 1 on the Trust website, [www.MNKPITrust.com](http://www.MNKPITrust.com), within five (5) days after the date of the Bar Date Order and to serve the Bar Date Notice by First-Class U.S. mail, postage prepaid, or by email, by June 15, 2024 utilizing the following methods and upon the following parties (the "Bar Date Notice Parties"):
  - a. all known actual or potential Personal Injury Claimants with unfiled or incomplete Personal Injury Claim as of May 15, 2024;
  - b. utilizing all the notice methods and to all the notice recipients that were carried out in performing the Initial Claimant Notice described in the Affidavit of the Trustee in Exhibit 2 (Exhibits thereto omitted to protect confidentiality);
  - c. all Law Firms that have filed one or more Personal Injury Claims with the Trust at May 15, 2024;
  - d. the Office of the United States Trustee for the District of Delaware;
  - e. the Internal Revenue Service and all applicable state and local taxing authorities;
  - f. the United States Attorney for the District of Delaware and other relevant state attorneys general; and

- g. all persons and entities listed on the service list maintained by the Debtors pursuant to Local Rule 2002-1(c) as of the date of entry of the Bar Date Order.

5. Pursuant to Bankruptcy Rules 2002(l) and 9008, the Court finds that notice of the Bar Date by mail or email to all potential creditors is impracticable, and therefore the Trustee is authorized and directed to give notice of the Bar Date by publishing the Bar Date Notice, modified for publication in substantially the form attached hereto as Exhibit 3 (the "Publication Notice") in the *Wall Street Journal* on one occasion on or about June 15, 2024. The Publication Notice shall include a telephone number and an email address for Personal Injury Claimants to request copies of the Claim Form, a URL for the website where Personal Injury Claimants may obtain copies of the Claim Form to file a Personal Injury Claim and can find information concerning the procedures for filing Personal Injury Claims.

6. The Trustee is authorized to enter into such transactions to effectuate the distribution of the Bar Date notice in Exhibit 1 and publication of the Publication Notice in Exhibit 3 as provided herein, including making reasonable payments required for such publication.

7. The form and manner of notice of the Bar Date and the relief granted by this Order, as provided herein, constitutes good, adequate and sufficient notice thereof, satisfies the requirements of the Bankruptcy Code, the Bankruptcy Rule and the Local Rules, and is approved in all respects.

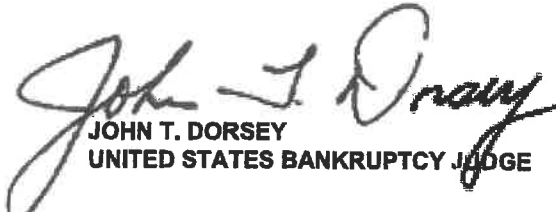
8. The Trustee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

9. Entry of this Order is without prejudice to the rights of the Trustee to seek a further order of this Court fixing a date by which holders of claims not subject to the Bar Dates established herein must file proofs of such claims or be barred from doing so.

10. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

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

Dated: December 20th, 2023  
Wilmington, Delaware

  
JOHN T. DORSEY  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1 TO ORDER**  
**PROPOSED BAR DATE NOTICE**

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

In re:	}	Chapter 11
	}	
MALLINCKRODT PLC	}	Case No. 20-12522 (JTD)
	}	
Reorganized Debtor.	}	Ref. Docket Nos. 6510 & 6660

**NOTICE OF MALLINCKRODT OPIOID PERSONAL INJURY TRUST JUNE 15, 2025  
BAR DATE FOR NON-FUTURE NON-NAS PERSONAL INJURY CLAIMS**

**TO: ALL PERSONS AND ENTITIES WITH NON-FUTURE NON-NAS PERSONAL INJURY CLAIMS:**

All persons and entities with Non-Future Non-NAS Personal Injury Claims: please take notice that on \_\_\_\_ 2023, the Trustee of the Mallinckrodt Opioid Personal Injury Trust (the "PI Trust") or (the "Trust") submitted a Motion of Trustee for Court determination of the Bar Date for Non-Future Non-NAS Personal Injury Claims as June 15, 2025.

On \_\_\_\_ 2023 the Bankruptcy Court entered the Bar Date Order establishing June 15, 2025 as the deadline for each person and entity (including, without limitation, individuals, partnerships, joint ventures, estates, and trusts), to file Non-Future Non-NAS Personal Injury Claims against the Trust (the "Bar Date").

A Non-NAS Personal Injury Claim is an opioid claim, including present and future claims, of any natural person for an alleged opioid-related personal injury or other similar opioid-related claim or cause of action, including opioid related personal injury claim. The BAR DATE DOES NOT apply to Future Non-NAS Personal Injury Claims, which are Non-NAS Personal Injury Claims resulting from the ingestion of a MNK opioid product that was produced by the time of the June 16, 2022 Trust Effective Date, but which results in injuries to the Claimant which manifest after the Effective Date.

**For more information about Non-NAS Personal Injury Claims, including information on how to qualify, what award you may be eligible for, what forms and documentation must be submitted, and when payments may be made, please go to the [www.mnkpitrust.com](http://www.mnkpitrust.com) website and refer to the Non-NAS PI Claims Tab as well as the Non-NAS PI Claims FAQs on the FAQs Tab of the website.**

**I. WHO MUST FILE A CLAIM FORM**

You MUST file a Claim Form to share in distributions from the Trust.

**THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HOLD A NON-FUTURE NON-NAS PERSONAL INJURY CLAIM AGAINST**

**THE TRUST OR THAT THE TRUST OR THE BANKRUPTCY COURT BELIEVE THAT YOU HOLD SUCH A CLAIM AGAINST THE TRUST. ALTHOUGH THE TRUST BELIEVES THAT YOU MAY HOLD SUCH A CLAIM AGAINST IT.**

**YOU SHOULD NOT FILE A CLAIM FORM FOR THIS TYPE OF CLAIM IF YOU DO NOT HOLD SUCH A CLAIM AGAINST THE TRUST, OR IF YOU HAVE ALREADY FILED SUCH A CLAIM.**

**II. WHO DOES NOT NEED TO FILE A CLAIM FORM**

You do not need to file a Claim Form for a Non-Future Non-NAS Personal Injury Claim if you have already filed one.

**III. INSTRUCTIONS FOR FILING A CLAIM FORM**

The instructions for filing a Claim Form are contained on the Trust website, whose address is [www.MNKPITrust.com](http://www.MNKPITrust.com). You may obtain a Claim Form from the website or by contacting the Trustee.

Each Claim Form must include supporting documentation.

In order to file a Claim Form, you must deliver the original Claim Form in person, by courier service, by hand delivery, by mail, by email, or by uploading it to the website so as to be actually received by the Trustee on or before the Bar Date at the following addresses:

If by First class mail:

Edgar C. Gentle, III, Esq.  
501 Riverchase Parkway East  
Suite 100  
Hoover, AL 35244

If by Hand or Overnight Delivery:

Edgar C. Gentle, III, Esq.  
501 Riverchase Parkway East  
Suite 100  
Hoover, AL 35244

If by Email:

[mnkpitrust@mnkpitrust.com](mailto:mnkpitrust@mnkpitrust.com)

If by uploading to the website:

[www.MNKPITrust.com](http://www.MNKPITrust.com)

**CLAIM FORMS MAY ALSO BE SENT BY FACSIMILE OR TELECOPY AT 205-716-2364.**

**IV. CONSEQUENCES OF FAILURE TO TIMELY FILE A CLAIM FORM FOR NON-FUTURE NON-NAS PERSONAL INJURY CLAIMS ON OR BEFORE THE BAR DATE**

Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), if you or any party or entity who is required, but fails, to file a Claim Form in accordance with the Bar Date Order on or before the applicable Bar Date, please be advised that:

**YOU SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH A CLAIM.**

**V. ADDITIONAL INFORMATION**

This notice is only a summary of the Bar Date Order. All creditors and other parties in interest are referred to the text of the Bar Date Order itself and to the Bankruptcy Code, Bankruptcy Rules and Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware for additional information regarding the filing and treatment of Claim Forms and should consult with their own legal advisors regarding any matters not covered by this Notice, such as whether such creditor should file a Claim Form.

Claim Forms and a copy of the Bar Date Order may be obtained by contacting the Trustee in writing at Edgar C. Gentle, III, Esq., Gentle Turner & Benson, LLC, 501 Riverchase Parkway East, Suite 100, Hoover, AL 35244, or by visiting the Trust website at [www.MNKPITrust.com](http://www.MNKPITrust.com) or by calling the Trust telephone number at (855) 637-5538.



**EXHIBIT 2 TO ORDER**

**PERSONAL INJURY TRUSTEE'S AFFIDAVIT REGARDING  
INITIAL CLAIMANT NOTICE**

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

-----x  
In re: : Chapter 11  
MALLINCKRODT PLC., et al., : Case No. 20-12522 (JTD)  
: (Jointly Administered)

-----x  
**PERSONAL INJURY TRUSTEE'S AFFIDAVIT REGARDING INITIAL CLAIMANT NOTICE**

Before me, the undersigned authority personally came and appeared, Edgar C. Gentle, III, the Court-appointed Personal Injury Trustee and Claims Administrator, who is known to me to be the person so described, who, after being duly sworn on oath, says that the following information is true and correct according to Affiant's best knowledge and belief:

I am sui juris, competent to testify, and have personal knowledge of the facts herein.

I am the founding partner of the law firm of Gentle, Turner, & Benson, LLC, and was appointed by the Court as the Personal Injury Trustee in the above-styled case.


Although there were no specific claimant noticing requirements for the Personal Injury Trust, the following measures have been taken to provide notice to potential personal injury claimants in accordance with Mullane v. Central Hanover, 339 U.S. 306 (1950).

1. On July 1, 2022, the Trust made the Mallinckrodt Opioid Personal Injury Trust website, [mnkpitrust.com](http://mnkpitrust.com), available to the public. The "Mallinckrodt Opioid Personal Injury Trust Notice" ("Notice") was published on the Home page of the website, and is in Exhibit A. The website is currently maintained and updated as Trust claims processing evolves over time.
2. On July 8, 2022, the Trust sent a digital copy of the "Mallinckrodt Opioid Personal Injury Trust Notice" ("Notice") via email to a potential Claimant's Counsel list. The list contained 1,044 potential email addresses derived from data from both the Mallinckrodt and Purdue bankruptcies. The Purdue data was provided to the Trust directly from Kroll. The Mallinckrodt data was provided

to the Trust by Defendants' Counsel. Of the 1,044 email addresses that were sent the Notice on July 8<sup>th</sup>, 90 were returned as "undeliverable," and 8 were returned with alternate email addresses. The 8 alternate email addresses were emailed the Notice on July 11, 2022. The Notice was ultimately distributed to a total of 962 potential Claimants' Counsel emails. (1,044 – 90 + 8 = 962) The email addresses are listed in Exhibit B.

3. On July 29, 2022, the Trust mailed paper copies of the "Mallinckrodt Opioid Personal Injury Trust Notice" ("Notice") to the mailing addresses of potential *Pro Se* claimants that were provided to the Trust by Kroll as part of the bankruptcy proceedings and by Mallinckrodt's Defense Counsel. The mailing address list contained 3,456 potential *Pro Se* claimant addresses and are listed in Exhibit C.
4. On August 5, 2022, the Trust sent a digital copy of the "Mallinckrodt Opioid Personal Injury Trust Notice" ("Notice") via electronic mail to email addresses of potential *Pro Se* claimants that were provided to the Trust by Kroll as part of the bankruptcy proceedings and by Mallinckrodt's Defense Counsel. The email list contained 556 potential email addresses, and 8 of those emails were returned as "undeliverable," as shown in Exhibit D.
5. On August 13, 2022, the Trust placed a 2 x 2-inch Public Notice in the Wall Street Journal Marketplace. This notice is in Exhibit E and states that the Mallinckrodt Opioid Personal Injury Trust had been established, was accepting claims, and directed potential claimants to the [mnkpitrust.com](http://mnkpitrust.com) website. The Trust intends to publish a similar notice every two years throughout the life of the Mallinckrodt Opioid Personal Injury Trust.
6. On September 22, 2022, the Trust employed Uptick Marketing, of Birmingham, Alabama, to run a Google Ads campaign for noticing purposes. This noticing period ran from October 2022 through January 24, 2023. During the noticing period, the Trust received monthly analytics reporting including key word searches, impressions, conversions into website clicks, and various other forms of data. The noticing report is in Exhibit F. The Trust intends to run similar digital marketing campaigns every two years throughout the life of the Mallinckrodt Opioid Personal Injury Trust.

FURTHER AFFIANT SAY NOT.

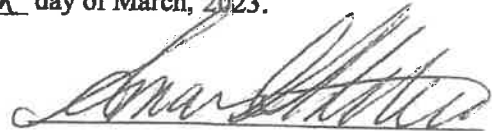


Edgar C. Gentle, III

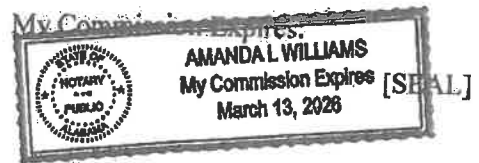
**STATE OF ALABAMA**  
**COUNTY OF SHELBY**

BEFORE ME, the undersigned, a notary public in and for said County and State, personally appeared Edgar C. Gentle, III, and acknowledges that he signed the foregoing Affidavit, and that said Affidavit is true and correct to the best of his knowledge and belief.

SWORN TO AND SUBSCRIBED before me this 6th day of March, 2023.



Notary Public.



**EXHIBIT 3 TO ORDER**

**PROPOSED PUBLICATION NOTICE**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	}	Chapter 11
	}	
MALLINCKRODT PLC	}	Case No. 20-12522 (JTD)
	}	
Reorganized Debtor.	}	Ref. Docket Nos. 6510 & 6660
	}	

**FORM OF PUBLICATION NOTICE OF MALLINCKRODT OPIOID PERSONAL INJURY TRUST JUNE 15, 2025 BAR DATE FOR NON-FUTURE NON-NAS PERSONAL INJURY CLAIMS**

**PLEASE TAKE NOTICE OF THE FOLLOWING**

**Entry of the Bar Date Order.** On \_\_\_\_\_, 2023, the Bankruptcy Court entered an order (the “Bar Date Order”) establishing June 15, 2025 (the “Bar Date”) as the deadline for the filing of Non-Future Non-NAS Personal Injury Claim Forms (the “Claim Form”) in the chapter 11 cases of the Mallinckrodt Opioid Personal Injury Trust (the “PI Trust”) or (the “Trust”).

**EXCEPT AS TO CERTAIN EXCEPTIONS EXPLICITLY SET FORTH IN THE BAR DATE ORDER, ANY PERSON OR ENTITY WHO FAILS TO FILE A CLAIM FORM ON OR BEFORE THE BAR DATE, SHALL BE: (1) FOREVER BARRED FROM ASSERTING THAT CLAIM.**

A Non-NAS Personal Injury Claim is an opioid claim, including present and future claims, of any natural person for an alleged opioid-related personal injury or other similar opioid-related claim or cause of action, including opioid related personal injury claim. The BAR DATE **DOES NOT** apply to Future Non-NAS Personal Injury Claims, which are Non-NAS Personal Injury Claims resulting from the ingestion of a MNK opioid product that was produced by the time of the June 16, 2022 Trust Effective Date, but which results in injuries to the Claimant which manifest after the Effective Date.

**For more information about Non-NAS Personal Injury Claims, including information on how to qualify, what award you may be eligible for, what forms and documentation must be submitted, and when payments may be made, please go to the [www.mnkpitrust.com](http://www.mnkpitrust.com) website and refer to the Non-NAS PI Claims Tab as well as the Non-NAS PI Claims FAQs on the FAQs Tab of the website.**

**Who Must File a Claim Form.** You **MUST** file a Claim Form to share in distributions from the Trust.

**Filing a Claim Form.** Each original Non-Future Non-NAS Personal Injury Claim Form must be filed, including supporting documentation, by hand delivery, by mail, by email, or by uploading it

to the website, so as to be actually received by the Trust, on or before the Bar Date at the following addresses:

If by First class mail:

Edgar C. Gentle, III, Esq.  
501 Riverchase Parkway East  
Suite 100  
Hoover, AL 35244

If by Hand or Overnight Delivery:

Edgar C. Gentle, III, Esq.  
501 Riverchase Parkway East  
Suite 100  
Hoover, AL 35244

If by Email:

[mnkpitrust@mnkpitrust.com](mailto:mnkpitrust@mnkpitrust.com)

If by uploading to the website:

[www.MNKPITrust.com](http://www.MNKPITrust.com)

**CLAIM FORMS MAY ALSO BE SENT BY FACSIMILE OR TELECOPY AT 205-716-2364.**

**Additional Information.** If you have any questions regarding the claims process and/or if you wish to obtain a copy of the Bar Date Motion, Bar Date Order, Claim Form or related documents (and/or any other pleadings filed in the case), you may do so by: (i) calling the Trustee at (855) 637-5538; (ii) visiting the Trustee's website, available at: [www.MNKPITrust.com](http://www.MNKPITrust.com); and/or by (iii) writing to (a) Edgar C. Gentle, III, Esq., 501 Riverchase Parkway East, Suite 100, Hoover, AL 35244, if by First class mail, or if by hand or overnight delivery.