

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

GRACEWAY PHARMACEUTICALS, LLC,
et al.,¹

Debtors.

Chapter 11

Case No. 11-13036 (PJW)

Jointly Administered

Docket Ref. No. 730

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' SECOND MOTION
FOR AN ORDER PURSUANT TO SECTION 105(A) OF THE BANKRUPTCY CODE
AND BANKRUPTCY RULES 9006 (b) AND 9027 EXTENDING TME TO FILE
NOTICES OF REMOVAL OF RELATED PROCEEDINGS**

I, Stuart M. Brown, an attorney with DLA Piper LLP (US), as counsel to Kip Horton, Liquidating Trustee (the "Liquidating Trustee"), in the above-captioned cases, hereby certifies the following:

1. On April 26, 2012, the Debtors filed the *Second Motion for An Order Pursuant to Section 105(a) Of The Bankruptcy Code And Bankruptcy Rules 9006(b) And 9027 Extending Time To File Notices Of Removal Of Related Proceedings* [Docket No. 730] (the "Motion"), in the above-captioned cases.

2. Any objections or responses to the Motion were to be filed with the Court and served upon the undersigned counsel by 4:00 p.m. on May 10, 2012.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Graceway Pharma Holding Corp., a Delaware corporation (9175), Case No. 11-13037 (PJW); Graceway Holdings, LLC, a Delaware limited liability company (2502), Case No. 11-13038 (PJW); Graceway Pharmaceuticals, LLC, a Delaware limited liability company (5385), Case No. 11-13036 (PJW); Chester Valley Holdings, LLC, a Delaware limited liability company (9457), Case No. 11-13039 (PJW); Chester Valley Pharmaceuticals, LLC, a Delaware limited liability company (3713), Case No. 11-13041 (PJW); Graceway Canada Holdings, Inc., a Delaware corporation (6663), Case No. 11-13042 (PJW); and Graceway International, Inc., a Delaware corporation (2399), Case No. 11-13043 (PJW). The mailing address for Graceway Pharmaceuticals, LLC is 340 Martin Luther King Jr. Blvd., Suite 500, Bristol, TN 37620 (Attn: John Bellamy). On October 4, 2011, Graceway Canada Company filed an application in the Ontario Superior Court of Justice (Commercial List) pursuant to the *Courts of Justice Act*, R.S.O. 1990, c. C. 43.

3. Pursuant to the *Debtors' First Amended Joint Plan of Liquidation* (the "Plan"), confirmed by this Court on April 20, 2012, Kip Horton was appointed as Liquidating Trustee of the Liquidating Trust (as defined in the Plan).

4. As of the date hereof, neither counsel for the Debtors or counsel for the Liquidating Trustee has been served with any objections or responses to the Motion. A review of the Court's docket indicates that, as of the filing of this Certificate of No Objection, no responses or objections to the Motion have been filed.

WHEREFORE the undersigned, on behalf of the Liquidating Trustee, respectfully requests that the form of order attached to the Motion, a copy of which attached hereto as Exhibit A, be entered at the Court's earliest convenience.

Dated: July 6, 2012
Wilmington, Delaware

Respectfully submitted,

/s/ Stuart M. Brown
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