

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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 In re: :
 Graceway Pharmaceuticals, LLC, *et al.*,¹ : Chapter 11
 Debtors. : Case No. 11-13036 (PJW)
 : (Jointly Administered)
 : Hearing Date: March 27, 2013 at 9:30 a.m. (ET)
 : Objection Deadline: March 20, 2013 at 4:00 p.m. (ET)
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**NOTICE OF MOTION OF LIQUIDATING TRUSTEE FOR AN ORDER
MODIFYING THE AUTOMATIC STAY WITH RESPECT
TO THE NYCOMED LITIGATION**

TO: Office of United States Trustee for the District of Delaware and all other parties requesting notice pursuant to Fed. R. Bankr. P. 2002.

PLEASE TAKE NOTICE that, on February 27, 2013, Kip Horton, in his capacity as liquidating trustee (“**Liquidating Trustee**”) of the Graceway Liquidating Trust, filed the *Motion of Liquidating Trustee for an Order Modifying The Automatic Stay with Respect to the Nycomed Litigation* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”), a copy of which is attached hereto.

PLEASE TAKE FURTHER NOTICE that, any response or objection to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19081, and served upon and received by the undersigned counsel for the Liquidating Trustee no later than March 20, 2013 at 4:00 p.m. (ET).

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 400, 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.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON MARCH 27, 2013 AT 9:30 A.M. (ET), BEFORE THE HONORABLE PETER J. WALSH, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 27, 2013
Wilmington, Delaware

Respectfully Submitted,
DLA PIPER LLP (US)

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*Counsel for Kip Horton,
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Graceway Liquidating Trust*