

JEFFER MANGELS BUTLER & MITCHELL LLP
BENNETT G. YOUNG (Bar No. 106504)

byoung@jmbm.com
Two Embarcadero Center, 5th Floor
San Francisco, California 94111-3813
Telephone: (415) 398-8080
Facsimile: (415) 398-5584

Proposed Attorney for
ARADIGM CORPORATION
Debtor and Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re
ARADIGM CORPORATION

CASE NO. 19-40363 WJL

Chapter 11

**DECLARATION OF BENNETT G.
YOUNG IN SUPPORT OF EX PARTE
MOTION BY DEBTOR AND DEBTOR IN
POSSESSION FOR ORDER
SHORTENING TIME FOR HEARING ON
MOTION OF DEBTOR AND DEBTOR IN
POSSESSION FOR INTERIM AND
FINAL AUTHORITY TO CONTINUE
EXISTING CASH MANAGEMENT
SYSTEM, AND MAINTAIN EXISTING
BANK ACCOUNTS AND BUSINESS
FORMS**

Judge: William J. Lafferty

NO HEARING REQUIRED

I, Bennett G. Young, declare:

1. I am an attorney of Jeffer Mangels Butler & Mitchell LLP, proposed
bankruptcy counsel for Aradigm Corporation, debtor and debtor in possession herein (the "Debtor").
My business address is Two Embarcadero Center, Fifth Floor, San Francisco, California 94111-
3813.

2. I make this declaration in support of ex parte motion for an order shortening
time (the "Motion For OST") for hearing on its Motion Of Debtor And Debtor In Possession For

1 Interim And Final Authority To Continue Existing Cash Management System, And Maintain
2 Existing Bank Accounts And Business Forms ("Motion"). The Motion and the Declaration of Lisa
3 Thomas in support thereof are Exhibits A and B to the Motion FOR OST. The facts set forth herein
4 are personally known to me except where those facts are expressly stated to be based on my
5 information and belief, and, as to those facts, I believe them to be true. If called upon to testify as to
6 the matters set forth herein, I could and would testify thereto as set forth herein.

7 **LOCAL RULE 9006-1(c) FACTORS**

8 3. The Debtor is making the Motion For OST because it believes that a prompt
9 resolution of the matters raised by the Motion is necessary and appropriate. The Motion seeks
10 authorization for the Debtor to maintain its existing cash management system, to continue to use its
11 existing bank accounts, and to continue to use its existing business forms. Whether the Debtor will
12 be authorized to continue to use its existing cash management system and its existing bank accounts
13 should be decided promptly. Moreover, the Debtor is informed that the process of closing the
14 Debtor's existing accounts and opening new DIP accounts, if such is required, will take some time.

15 4. No previous time modifications related to the matters addressed by the
16 Motion have been requested.

17 5. There is no respondent with respect to the Motion and contacting all parties
18 in interest in the Debtor's chapter 11 case is not practical. The Debtor has served the Motion For
19 OST through the ECF system on all parties that have filed a request for notice, among which is the
20 Office of the United States Trustee, and by overnight mail on the SEC and the creditors listed on the
21 Debtor's list of 20 largest creditors.

22 I declare under penalty of perjury under the laws of the United States of America that
23 the foregoing is true and correct.

24 DATED: February 22, 2019

/s/ Bennett G. Young
BENNETT G. YOUNG, Declarant