

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

In re:

AZZUR GROUP HOLDINGS LLC, *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 25-10342 (KBO)

(Jointly Administered)

**Related D.I.: 93**

**ORDER (I) ESTABLISHING DEADLINES FOR FILING PROOFS OF CLAIM,  
INCLUDING SECTION 503(b)(9) CLAIMS AND (II) APPROVING THE FORM  
AND MANNER OF NOTICE THEREOF, AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)<sup>2</sup> of Azzur Group Holdings LLC and its affiliated debtors (collectively, the “Debtors”) for entry of an order (i) establishing deadlines for filing Proofs of Claim, including 503(b)(9) Claims, (ii) approving the form and notice thereof, and (iii) granting related relief, all as more fully described in the Motion; and upon consideration of the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409; and this Court having found and determined the relief sought in the Motion is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and this Court having determined

---

<sup>1</sup> A list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Azzur>. The Debtors’ headquarters and the mailing address for the Debtors is 330 South Warminster Road, Suite 341, Hatboro, PA 19040.

<sup>2</sup> Capitalized terms used but not defined in this Order shall have the meaning given to them in the Motion.

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 after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED, as set forth in this Order.
2. General Bar Date: Pursuant to Bankruptcy Rule 3003(c)(2), any creditor (as defined in section 101(10) of the Bankruptcy Code) who asserts a claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose, or is deemed to have arisen, prior to the applicable Petition Date and whose claim is either (a) not listed on the Debtors' schedules of assets and liabilities (collectively, the "Schedules") or (b) is listed on the Schedules as disputed, contingent or unliquidated, must file a Proof of Claim by the date that is thirty (30) days from the date on which the Debtors file the Schedules and serve the Bar Date Notice, which shall be **April 30, 2025 at 5:00 p.m. (ET)** (the "General Bar Date").
3. Governmental Bar Date: Notwithstanding paragraph 2 above, the deadline for governmental units (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim is **September 1, 2025 at 5:00 p.m. (ET)**.
4. Amended Schedules Bar Date: If the Debtors amend their Schedules, then the deadline to submit a Proof of Claim for those creditors affected by any such amendment shall be the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m. (ET) on the date that is thirty (30) days from the date on which the Debtor provides notice of an amendment or supplement to the Schedules.
5. Rejection Damages Claims Bar Date: Any person or entity that holds a claim that arises from the rejection of an executory contract or unexpired lease must file a Proof of Claim based on such rejection by the later of (i) the General Bar Date or the Governmental Bar Date, as

applicable, and (ii) 5:00 p.m. (ET) on the date that is thirty (30) days following entry of an order approving the rejection of an executory contract or unexpired lease.

6. The Court hereby approves (i) the forms of the Bar Date Notice, the Publication Notice and the Proof of Claim Form, substantially in the forms attached to this Order as **Exhibit 1**, **Exhibit 2**, and **Exhibit 3**, respectively, and (ii) the manner of providing notice of the Bar Dates as described in the Motion.

7. The following procedures for filing Proofs of Claim are hereby approved and adopted in these chapter 11 cases:

- (a) Proofs of Claim must conform substantially to the Proof of Claim Form<sup>3</sup> attached to this Order as **Exhibit 3**;
- (b) All Proofs of Claim must be actually filed and/or received on or before the applicable Bar Date;
- (c) All Proofs of Claim must be (i) filed electronically at <https://cases.stretto.com/Azzur/file-a-claim>, or (ii) submitted to the Debtors' claims and noticing agent ("**Stretto**") in person, by courier service, hand delivery or mailed to: Azzur Group Holdings LLC, *et al.* Claims Processing, c/o Stretto, 410 Exchange, Suite 100, Irvine, CA 92602. Submissions of a Proof of Claim Form by email and/or facsimile transmission is not permitted;
- (d) Proofs of Claim will be deemed timely filed only if they are actually received by Stretto or filed on or before the applicable Bar Date;
- (e) Proofs of Claim must: (i) be in writing and signed by the claimant, or, if the claimant is not an individual, by an authorized agent of the claimant; (ii) include supporting documentation or, if voluminous, a summary of the supporting documents and an explanation as to why documentation is attached and where such supporting documentation may be obtained; (iii) be in the English language; and (iv) be denominated in United States currency (USD);

---

<sup>3</sup> The Proof of Claim Form is substantially in the form of Official Form 410, which is available at <http://www.uscourts.gov/forms/bankruptcy-forms>. The Proof of Claim Form is also available on Stretto's website: <https://cases.stretto.com/Azzur>.

- (f) In addition to the foregoing, Proofs of Claim asserting 503(b)(9) Claims<sup>4</sup> must also: (i) include the value of the goods delivered to and received by the applicable Debtor within twenty (20) days prior to the applicable Petition Date; (ii) attach any documentation identifying the particular invoice(s) corresponding to the asserted 503(b)(9) Claim and delivery address; and (iii) attach documentation evidencing the delivery of the goods delivered to and received by the applicable Debtor within twenty (20) days prior to the applicable Petition Date;
- (g) Each Proof of Claim must specify, by name, the Debtor against which the claim is asserted, and, if the holder asserts a claim against more than one Debtor, a separate Proof of Claim must be filed against each such Debtor. If the holder lists multiple Debtors on the Proof of Claim, then the Debtors will treat such claim as if it is filed against the first listed Debtor. If the holder files a Proof of Claim without identifying a Debtor, such Proof of Claim will be deemed as filed only against Azzur Group Holdings LLC;
- (h) Any person or entity that files a Proof of Claim by mail and wishes to receive a date-stamped copy by return mail should include an additional copy of the Proof of Claim and a self-addressed, postage-paid envelope; and
- (i) Notwithstanding anything to the contrary in this Order, any provision of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, any order of this Court, any Proof of Claim Form or any Bar Date Notice, (a) ACE American Insurance Company, on its own behalf and on behalf of all of its U.S.-based affiliates and successors (collectively, the “Chubb Companies”), may file a single consolidated Proof of Claim based on the insurance policies issued by any of the Chubb Companies to (or providing coverage to) the Debtors (or their predecessors) and any agreements related thereto (the “Consolidated Claim”) in the chapter 11 case of Azzur Group Holdings, LLC, Case No. 25-10342 (the “Lead Case”), which shall be deemed filed by each of the Chubb Companies not only in the Lead Case, but also in the chapter 11 case of each of the Debtors; and (b) as the documents supporting the Consolidated Claim are voluminous and contain confidential information, the documents supporting the Consolidated Claim are not required to be filed with, and will not be filed with, the Consolidated Claim, and a summary of the documents supporting the Consolidated Claim will be filed with the Consolidated Claim instead. Nothing contained in this paragraph shall be construed as a waiver or modification of any rights, claims or defenses, including, without limitation, the right of the Chubb Companies to (i) assert joint and several liability against some or all of the Debtors, (ii) modify the Debtor(s) against which the Consolidated Claim is asserted, or (iii) amend the amount or nature of the Consolidated Claim, and for the avoidance of doubt, any amendments that the Chubb Companies may make with respect to the Consolidated Claim may be made to the

---

<sup>4</sup> “503(b)(9)” refers to section 503(b)(9) of the Bankruptcy Code. See 11 U.S.C. § 503(b)(9).

Consolidated Claim only in the Lead Case and only against Azzur Group Holdings, LLC (instead of in the chapter 11 cases of each or any of the other Debtors); provided, however, that the Consolidated Claim shall not be disallowed, reduced or expunged solely on the basis that the Consolidated Claim is filed (1) only in the Lead Case and only against Azzur Group Holdings, LLC (instead of in the bankruptcy cases of each or any of the other Debtors), and/or (2) only by ACE American Insurance Company (instead of by each of the Chubb Companies); provided further, however, that to the extent that the Chubb Companies elect to vote and/or opt-in (or opt-out) of any releases in connection with any chapter 11 plan filed by the Debtors, ACE American Insurance Company, on its own behalf and on behalf of all of the Chubb Companies, may submit a single consolidated ballot and the elections in such consolidated ballot shall be deemed to apply to each of the Chubb Companies.

8. The following persons and entities are not required to file a Proof of Claim in accordance with the procedures set forth in this Order:

- (a) Any person or entity that has already properly filed a Proof of Claim against a Debtor with Stretto or the Clerk of the United States Bankruptcy Court for the District of Delaware, in a form substantially similar to Official Form 410;
- (b) Any person or entity whose claim is listed on a Debtor's Schedule D or E/F, and (i) the claim is not described as "disputed," "contingent," or "unliquidated," (ii) such person or entity agrees with the amount, nature, and priority of the claim set forth in the Schedules, and (iii) such person or entity agrees that the claim is an obligation of the specific Debtor that listed the claim in its Schedules;
- (c) Any person or entity whose claim has been allowed by an order of the Court entered on or before the applicable Bar Date, including, without limitation, any interim and final orders, as applicable, authorizing the Debtors' use of cash collateral and/or post-petition debtor-in-possession financing;
- (d) Any person or entity whose claim has been paid or otherwise satisfied in full by the Debtors or any other party prior to the applicable Bar Date;
- (e) Any holder of a claim for which the Court has already fixed a specific deadline to file a Proof of Claim;
- (f) Any holder of an equity interest in any Debtor with respect to the ownership of such equity interest; *provided, however*, that any holder of an equity interest wishing to assert a claim against any Debtor other than with respect to ownership of such equity interest, including, but not limited to, a claim relating to the purchase or sale of such interest or rescission under section

510(b) of the Bankruptcy Code, must submit a proof of claim on or before the applicable Bar Date pursuant to the procedures set forth herein;

- (g) Any holder of a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration of the Debtors' estates, **except for a holder of a claim arising under section 503(b)(9) of the Bankruptcy Code, which must be asserted by filing a Proof of Claim on or prior to the General Bar Date;**
- (h) Any officer or director of the Debtors as of the Petition Date who has a claim for indemnification, contribution, or reimbursement;
- (i) Any person or entity holding a claim payable to the Court or the United States Trustee Program pursuant to 28 U.S.C. § 1930; and
- (j) Any affiliate (as defined in section 101(2) of the Bankruptcy Code) of the Debtors that is a creditor for its claims against any Debtor.

9. Supplemental Mailings and Publication. After the initial mailing of the Bar Date Notice, the Debtors are authorized to may make supplemental mailings of notices, including in the event that (a) notices are returned by the post office with forwarding addresses, (b) certain parties acting on behalf of claimants decline to pass along notices to claimants and instead return their names and addresses to the Debtors for direct mailing, and (c) additional potential holders of claims or creditors' contact information become known. If applicable, the Debtors shall make such supplemental mailings of the Bar Date Notice in these and similar circumstances at any time up to fourteen (14) days in advance of the applicable Bar Date, with any such mailings being deemed timely and the Bar Date being applicable to such holders of claims.

10. The Debtors shall publish the Publication Notice, with any modifications necessary to facilitate publication, in the national edition of the *Wall Street Journal*, *New York Times*, *USA Today* or other publication of like circulation. The Publication Notice shall be deemed to provide effective notice of the applicable Bar Dates to all creditors, including (a) any creditors who are unknown or not reasonably ascertainable by the Debtors, (b) known creditors with addresses that

are unknown to the Debtors or are no longer accurate and/or updated, and (c) potential creditors with claims against the Debtors.

11. **Any holder of a claim against any Debtor who receives notice of the applicable Bar Date (whether such notice was actually or constructively received), and is required, but fails to file a Proof of Claim in accordance with this Order on or before the applicable Bar Date shall not be treated as a creditor of any Debtor for purposes of voting upon or receiving distributions under any plan of reorganization or liquidation filed in these chapter 11 cases absent further order of the Court.**

12. No later than one (1) business day after the later of (x) entry of this Order or (y) the filing of the Schedules, or as soon as practicable thereafter, the Debtors shall cause service of the Bar Date Notice, substantially in the form attached to this Order as **Exhibit 1**, by first class U.S. mail, postage prepaid, or by email, in accordance with Local Rule 2002-1(c), along with a copy of the Proof of Claim Form on the following parties:

- (a) All parties that have requested notice in these chapter 11 cases;
- (b) All persons or entities that have previously filed Proofs of Claim;
- (c) All known or suspected holders of claims against any Debtor as of the Petition Date, including all persons or entities listed in the Schedules or that have previously filed a Proof of Claim.
- (d) All parties to executory contracts and unexpired leases of any Debtor;
- (e) All parties in litigation with any Debtor; and
- (f) All applicable Governmental Units, including the Internal Revenue Service, the U.S. Attorney for the District of Delaware, and the attorney general and taxing authorities for each state in which the Debtors operate.

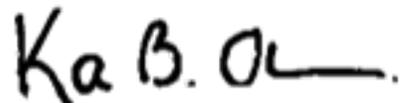
13. The Debtors shall mail the Bar Date Notice to each of the foregoing party's last known address included in the Debtors' books and records.

14. Nothing in this Order shall prejudice the right of any Debtor or any other party in interest to dispute, or to assert offsets or defenses to, any claim reflected in the Debtors' Schedules as to amount, liability, characterization, or otherwise, and to subsequently designate any claim as disputed, contingent, or unliquidated.

15. The Debtors are hereby authorized to take all actions they deem necessary to effectuate the relief granted in this Order.

16. This Court shall retain jurisdiction over any and all matters arising from the interpretation or enforcement of this Order.

Dated: March 28th, 2025  
Wilmington, Delaware

  
KAREN B. OWENS  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

**Form of Bar Date Notice**

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

In re:

AZZUR GROUP HOLDINGS LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10342 (KBO)

(Jointly Administered)

**Related D.I.: 93**

**NOTICE OF DEADLINE FOR FILING  
PROOFS OF CLAIM, INCLUDING 503(b)(9) CLAIMS BAR DATE**

**PLEASE TAKE NOTICE** that, on March 2, 2025 (the “Petition Date”),<sup>2</sup> Azzur Group Holdings LLC and its affiliated debtors (collectively, the “Debtors”) in the above-captioned chapter 11 cases filed voluntary petitions for relief under chapter 11 of 11 U.S.C. 101 *et seq.* (the “Bankruptcy Code”).

**PLEASE TAKE FURTHER NOTICE** that, on [•], 2025, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order (the “Bar Date Order”) establishing:

- (a) **General Bar Date:** the date that is thirty (30) days from the date on which the Debtors file the schedules of assets and liabilities (the “Schedules”) and serve this Bar Date Notice, which shall be **April 30, 2025 at 5:00 p.m. (ET)**, as the deadline for all persons or entities, other than governmental units (as defined in section 101(27) of the Bankruptcy Code, “Governmental Units”), to file proofs of claim (each, a “Proof of Claim”) based on claims against any Debtor that arose prior to the Petition Date, including claims for the value of goods sold to any Debtor in the ordinary course of business and received by such Debtor within twenty (20) days before the Petition Date (each, a “503(b)(9) Claim”) that remain unpaid (the “General Bar Date”);
- (b) **Governmental Bar Date: September 1, 2025, at 5:00 p.m. (ET)** as the deadline for all Governmental Units to file Proofs of Claim against any Debtor based on claims against such Debtor that arose prior to the Petition Date that remain unpaid (the “Governmental Bar Date”);

---

<sup>1</sup> A list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Azzur>. The Debtors’ headquarters and the mailing address for the Debtors is 330 South Warminster Road, Suite 341, Hatboro, PA 19040.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning given to them in the *Motion of the Debtors For Entry of an Order (I) Establishing Deadlines for Filing Proofs of Claim, Including Section 503(B)(9) Claims, (II) Approving the Form and Manner of Notice Thereof, and (III) Granting Related Relief* [D.I. [•]] (the “Motion”) or the Bar Date Order as applicable.

- (c) **Amended Schedules Bar Date:** The later of (i) the General Bar Date or the Governmental Bar Date, as applicable; and (ii) 5:00 p.m. (ET) on the date that is thirty (30) days from the date on which the Debtors provide notice of an amendment or supplement to the Schedules as the deadline by which claimants holding claims affected by such amendment or supplement must file Proofs of Claim with respect to such claim; and
- (d) **Rejection Damages Claims Bar Date:** The later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m. (ET) on the date that is thirty (30) days following entry of an order approving the rejection of an executory contract or unexpired lease (a “Rejection Order”) as the deadline for any non-debtor counterparty to a rejected executory contract or lease to file a Proof of Claim based on any relief set forth in the applicable Rejection Order.

**You should consult an attorney if you have any questions, including whether to file a Proof of Claim. If you have any questions with respect to this notice, you may contact the Debtors’ claims and noticing agent, Stretto, Inc. (“Stretto”), by e-mail at TeamAzzur@stretto.com, or by calling the toll-free information line at (833) 900-1730 (or (949) 202-5650 if calling from outside the United States or Canada). Please note that Stretto is not permitted to provide legal advice.**

## **I. WHO MUST FILE A PROOF OF CLAIM**

You **MUST** file a Proof of Claim if you have a claim that arose prior to the Petition Date, and it is not a claim described in Section II below. Acts or omissions of the Debtors that arose prior to the Petition Date may give rise to claims against the Debtors that must be filed by the applicable Bar Dates, notwithstanding that such claims may not be admitted by any Debtor or have matured or become fixed or liquidated as of the Petition Date.

Pursuant to section 101(5) of the Bankruptcy Code and as used herein, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

Proofs of Claim will be deemed timely filed *only if* they are actually received by Stretto on or before the applicable Bar Date. Proofs of Claim submitted by facsimile or e-mail *will not be accepted*.

## **II. WHO DOES NOT NEED TO FILE A PROOF OF CLAIM**

- (a) Any person or entity that has already properly filed a Proof of Claim against a Debtor with Stretto or the Clerk of the United States Bankruptcy Court for the District of Delaware, in a form substantially similar to Official Form 410;
- (b) Any person or entity whose claim is listed on a Debtor’s Schedule D or E/F, and (i) the claim is not described as “disputed,” “contingent,” or “unliquidated,”

- (ii) such person or entity agrees with the amount, nature, and priority of the claim set forth in the Schedules, and (iii) such person or entity agrees that the claim is an obligation of the specific Debtor that listed the claim in its Schedules;
- (c) Any person or entity whose claim has been allowed by an order of the Court entered on or before the applicable Bar Date, including, without limitation, any interim and final orders, as applicable, authorizing the Debtors' use of cash collateral and/or post-petition debtor-in-possession financing;
  - (d) Any person or entity whose claim has been paid or otherwise satisfied in full by the Debtors or any other party prior to the applicable Bar Date;
  - (e) Any holder of a claim for which the Court has already fixed a specific deadline to file a Proof of Claim;
  - (f) Any holder of an equity interest in any Debtor with respect to the ownership of such equity interest; *provided, however*, that any holder of an equity interest wishing to assert a claim against any Debtor other than with respect to ownership of such equity interest, including, but not limited to, a claim relating to the purchase or sale of such interest or rescission under section 510(b) of the Bankruptcy Code, must submit a proof of claim on or before the applicable Bar Date pursuant to the procedures set forth herein;
  - (g) Any holder of a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration of the Debtors' estates, **except for a holder of a claim arising under section 503(b)(9) of the Bankruptcy Code, which must be asserted by filing a Proof of Claim on or prior to the General Bar Date;**
  - (h) Any officer or director of the Debtors as of the Petition Date who has a claim for indemnification, contribution, or reimbursement;
  - (i) Any person or entity holding a claim payable to the Court or the United States Trustee Program pursuant to 28 U.S.C. § 1930; and
  - (j) Any affiliate (as defined in section 101(2) of the Bankruptcy Code) of the Debtors that is a creditor for its claims against any Debtor.

**You should not file a Proof of Claim if you do not have a claim against any of the Debtors. The fact that you have received this Bar Date Notice does not mean that you have a claim or that the Debtors or the Court believe that you have a claim.**

### **III. HOW TO FILE A PROOF OF CLAIM**

Enclosed herewith as an exhibit is a Proof of Claim Form, in a form substantially similar to Official Form 410. Additional Proof of Claim forms and instructions may be obtained at (i) the website established by Stretto, located at <https://cases.stretto.com/Azzur> or (ii) the Bankruptcy

Court's website located at <https://www.deb.uscourts.gov>. You may utilize the Proof of Claim Form(s) provided by the Debtors in order to file your claim(s).

The following procedures with respect to preparing and filing Proofs of Claim will apply:

- (a) Proofs of Claim must conform substantially to the Proof of Claim Form attached to the Bar Date Order as Exhibit 3;
- (b) All Proofs of Claim must be actually filed and/or received on or before the applicable Bar Date;
- (c) All Proofs of Claim must be (i) filed electronically at <https://cases.stretto.com/Azzur/file-a-claim>, or (ii) submitted to Stretto in person, by courier service, hand delivery or mailed to: **Azzur Group Holdings LLC, et al. Claims Processing, c/o Stretto, Inc., 410 Exchange, Suite 100, Irvine, CA 92602**. Submissions of a Proof of Claim Form by email and/or facsimile transmission is not permitted;
- (d) Proofs of Claim will be deemed timely filed only if they are actually received by Stretto or filed on or before the applicable Bar Date;
- (e) Proofs of Claim must: (i) be in writing and signed by the claimant, or, if the claimant is not an individual, by an authorized agent of the claimant; (ii) include supporting documentation or, if voluminous, a summary of the supporting documents and an explanation as to why documentation is attached and where such supporting documentation may be obtained; (iii) be in the English language; and (iv) be denominated in United States currency (USD);
- (f) In addition to the foregoing, Proofs of Claim asserting 503(b)(9) Claims<sup>3</sup> must also: (i) include the value of the goods delivered to and received by the applicable Debtor within twenty (20) days prior to the applicable Petition Date; (ii) attach any documentation identifying the particular invoice(s) corresponding to the asserted 503(b)(9) Claim and delivery address; and (iii) attach documentation evidencing the delivery of the goods delivered to and received by the applicable Debtor within twenty (20) days prior to the applicable Petition Date;
- (g) Each Proof of Claim must specify, by name, the Debtor against which the claim is asserted, and, if the holder asserts a claim against more than one Debtor, a separate Proof of Claim must be filed against each such Debtor. If the holder lists multiple Debtors on the Proof of Claim, then the Debtors will treat such claim as if it is filed against the first listed Debtor. If the holder files a Proof of Claim without identifying a Debtor, such Proof of Claim will be deemed as filed only against Azzur Group Holdings LLC;

---

<sup>3</sup> "503(b)(9)" refers to section 503(b)(9) of the Bankruptcy Code. See 11 U.S.C. § 503(b)(9).

- (h) Any person or entity that files a Proof of Claim by mail and wishes to receive a date-stamped copy by return mail should include an additional copy of the Proof of Claim and a self-addressed, postage-paid envelope; and
- (i) Notwithstanding anything to the contrary in the Bar Date Order, any provision of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, any order of this Court, any Proof of Claim Form or this Bar Date Notice, (a) ACE American Insurance Company, on its own behalf and on behalf of all of its U.S.-based affiliates and successors (collectively, the “Chubb Companies”), may file a single consolidated Proof of Claim based on the insurance policies issued by any of the Chubb Companies to (or providing coverage to) the Debtors (or their predecessors) and any agreements related thereto (the “Consolidated Claim”) in the chapter 11 case of Azzur Group Holdings, LLC, Case No. 25-10342 (the “Lead Case”), which shall be deemed filed by each of the Chubb Companies not only in the Lead Case, but also in the chapter 11 case of each of the Debtors; and (b) as the documents supporting the Consolidated Claim are voluminous and contain confidential information, the documents supporting the Consolidated Claim are not required to be filed with, and will not be filed with, the Consolidated Claim, and a summary of the documents supporting the Consolidated Claim will be filed with the Consolidated Claim instead. Nothing contained in this paragraph shall be construed as a waiver or modification of any rights, claims or defenses, including, without limitation, the right of the Chubb Companies to (i) assert joint and several liability against some or all of the Debtors, (ii) modify the Debtor(s) against which the Consolidated Claim is asserted, or (iii) amend the amount or nature of the Consolidated Claim, and for the avoidance of doubt, any amendments that the Chubb Companies may make with respect to the Consolidated Claim may be made to the Consolidated Claim only in the Lead Case and only against Azzur Group Holdings, LLC (instead of in the chapter 11 cases of each or any of the other Debtors); provided, however, that the Consolidated Claim shall not be disallowed, reduced or expunged solely on the basis that the Consolidated Claim is filed (1) only in the Lead Case and only against Azzur Group Holdings, LLC (instead of in the bankruptcy cases of each or any of the other Debtors), and/or (2) only by ACE American Insurance Company (instead of by each of the Chubb Companies); provided further, however, that to the extent that the Chubb Companies elect to vote and/or opt-in (or opt-out) of any releases in connection with any chapter 11 plan filed by the Debtors, ACE American Insurance Company, on its own behalf and on behalf of all of the Chubb Companies, may submit a single consolidated ballot and the elections in such consolidated ballot shall be deemed to apply to each of the Chubb Companies.

#### **IV. CONSEQUENCES FOR FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE**

**Except as described in Section II above, as applicable, any holder of a claim against any Debtor who received notice of the Bar Dates (whether such notice was actually or constructively received) and is required, but fails, to file a Proof of Claim in accordance with the Bar Date Order and this Bar Date Notice on or before the applicable Bar Date shall not**

**be treated as a creditor of any Debtor for purposes of voting upon or receiving distributions under any plan of reorganization or liquidation filed in these chapter 11 cases absent further order of the Court.**

**V. THE DEBTORS' SCHEDULES AND ACCESS THERETO**

You may be listed in the Debtors' Schedules. Upon filing the Schedules, interested parties may examine copies of the Schedules at <https://cases.stretto.com/Azzur>. If you rely on the Debtors' Schedules, it is your responsibility to determine that your claim is accurately listed in the Schedules. However, you may rely on the enclosed Proof of Claim form(s), which may list your claim(s) as scheduled, identify the applicable Debtor against which such claim(s) is scheduled, or specify whether such claim(s) is disputed, contingent, or unliquidated. As set forth above, if you agree with the nature, amount, and status of your claim as listed in the Debtors' Schedules or as set forth in the Proof of Claim attached hereto, and if you do not dispute that your claim is only against the Debtor specified, and if your claim is not described as "disputed," "contingent," or "unliquidated," you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date, in accordance with the procedures set forth in this Bar Date Notice.

Dated: [•], 2025  
Wilmington, Delaware

Respectfully submitted,

**DLA PIPER LLP (US)**

/s/ DRAFT  
Stuart M. Brown (DE 4050)  
1201 North Market Street, Suite 2100  
Wilmington, Delaware 19801  
Telephone: (302) 468-5700  
Facsimile: (302) 394-2462  
Email: [stuart.brown@us.dlapiper.com](mailto:stuart.brown@us.dlapiper.com)

- and -

W. Benjamin Winger (admitted *pro hac vice*)  
444 West Lake Street, Suite 900  
Chicago, Illinois 60606  
Telephone: (312) 368-4000  
Facsimile: (312) 236-7516  
Email: [benjamin.winger@us.dlapiper.com](mailto:benjamin.winger@us.dlapiper.com)

*Proposed Counsel to the Debtors*

**EXHIBIT 2**

**Form of Publication Notice**

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

In re:

AZZUR GROUP HOLDINGS LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10342 (KBO)

(Jointly Administered)

**Related D.I.: 93**

**NOTICE OF DEADLINE FOR FILING PROOFS  
OF CLAIM, INCLUDING 503(b)(9) CLAIMS BAR DATE**

**PLEASE TAKE NOTICE** that, on March 2, 2025 (the “Petition Date”), Azzur Group Holdings LLC and its affiliated debtors (collectively, the “Debtors”) in the above-captioned chapter 11 cases filed voluntary petitions for relief under chapter 11 of 11 U.S.C. 101 *et seq.* (the “Bankruptcy Code”).

**PLEASE TAKE FURTHER NOTICE** that, on [•], 2025, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order (the “Bar Date Order”) establishing:

- (a) **General Bar Date:** the date that is thirty (30) days from the date on which the Debtors file the schedules of assets and liabilities (the “Schedules”) and serve this Publication Notice, which shall be **April 30, 2025 at 5:00 p.m. (ET)**, as the deadline for all persons or entities, other than governmental units (as defined in section 101(27) of the Bankruptcy Code, “Governmental Units”), to file proofs of claim (each, a “Proof of Claim”) based on claims against any Debtor that arose prior to the Petition Date, including claims for the value of goods sold to any Debtor in the ordinary course of business and received by such Debtor within twenty (20) days before the Petition Date (each, a “503(b)(9) Claim”)² that remain unpaid (the “General Bar Date”);
- (b) **Governmental Bar Date: September 1, 2025, at 5:00 p.m. (ET)** as the deadline for all Governmental Units to file Proofs of Claim against any Debtor based on claims against such Debtor that arose prior to the Petition Date that remain unpaid (the “Governmental Bar Date”);
- (c) **Amended Schedules Bar Date:** The later of (i) the General Bar Date or the Governmental Bar Date, as applicable; and (ii) 5:00 p.m. (ET) on the date that is thirty (30) days from the date on which the Debtors provide notice of an amendment

<sup>1</sup> A list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Azzur>. The Debtors’ headquarters and the mailing address for the Debtors is 330 South Warminster Road, Suite 341, Hatboro, PA 19040.

<sup>2</sup> “503(b)(9)” refers to section 503(b)(9) of the Bankruptcy Code. *See* 11 U.S.C. § 503(b)(9).

or supplement to the Schedules as the deadline by which claimants holding claims affected by such amendment or supplement must file Proofs of Claim with respect to such claim; and

- (d) **Rejection Damages Claims Bar Date:** The later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) 5:00 p.m. (ET) on the date that is thirty (30) days following entry of an order approving the rejection of an executory contract or unexpired lease (a “Rejection Order”) as the deadline for any non-debtor counterparty to a rejected executory contract or lease to file a Proof of Claim based on any relief set forth in the applicable Rejection Order.

**You should consult an attorney if you have any questions, including whether to file a Proof of Claim. If you have any questions with respect to this notice, you may contact the Debtors’ claims and noticing agent, Stretto, Inc., by e-mail at [TeamAzzur@stretto.com](mailto:TeamAzzur@stretto.com), or by calling the toll-free information line at (833) 900-1730 (or (949) 202-5650 if calling from outside the United States or Canada). Please note that Stretto is not permitted to provide legal advice.**

**EXHIBIT 3**

**Proof of Claim Form**

Name of Debtor & Case Number:

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Azzur Group Holdings LLC (25-10342)                       | <input type="checkbox"/> Azzur Denver LLC (25-10353)               | <input type="checkbox"/> Azzur of CA, LLC (25-10360)                      |
| <input type="checkbox"/> Azzur Austin LLC (25-10349)                               | <input type="checkbox"/> Azzur Group, LLC (25-10343)               | <input type="checkbox"/> Azzur of NE, LLC (25-10363)                      |
| <input type="checkbox"/> Azzur Chicago LLC (25-10350)                              | <input type="checkbox"/> Azzur IT LLC (25-10356)                   | <input type="checkbox"/> Azzur Princeton LLC (25-10344)                   |
| <input type="checkbox"/> Azzur Cleanrooms-On-Demand – Boston LLC (25-10371)        | <input type="checkbox"/> Azzur Labs – Boston LLC (25-10364)        | <input type="checkbox"/> Azzur San Diego LLC (25-10348)                   |
| <input type="checkbox"/> Azzur Cleanrooms-On-Demand – Burlington LLC (25-10373)    | <input type="checkbox"/> Azzur Labs – Chicago LLC (25-10366)       | <input type="checkbox"/> Azzur San Francisco LLC (25-10352)               |
| <input type="checkbox"/> Azzur Cleanrooms-On-Demand – Devens LLC (25-10346)        | <input type="checkbox"/> Azzur Labs – Dallas LLC (25-10368)        | <input type="checkbox"/> Azzur Solutions LLC (25-10355)                   |
| <input type="checkbox"/> Azzur Cleanrooms-On-Demand – Raleigh LLC (25-10351)       | <input type="checkbox"/> Azzur Labs – San Diego LLC (25-10370)     | <input type="checkbox"/> Azzur Technical Services – Boston LLC (25-10358) |
| <input type="checkbox"/> Azzur Cleanrooms-On-Demand – San Diego LLC (25-10354)     | <input type="checkbox"/> Azzur Labs – San Francisco LLC (25-10372) | <input type="checkbox"/> Azzur Training Center – Raleigh LLC (25-10362)   |
| <input type="checkbox"/> Azzur Cleanrooms-On-Demand – San Francisco LLC (25-10357) | <input type="checkbox"/> Azzur Labs NC, LLC (25-10374)             | <input type="checkbox"/> Azzur Washington DC LLC (25-10365)               |
| <input type="checkbox"/> Azzur Cleanrooms-On-Demand – Services LLC (25-10369)      | <input type="checkbox"/> Azzur Labs, LLC. (25-10361)               | <input type="checkbox"/> Azzur Worcester LLC (25-10367)                   |
| <input type="checkbox"/> Azzur Consulting, LLC (25-10347)                          | <input type="checkbox"/> Azzur North Carolina, LLC (25-10359)      | <input type="checkbox"/> Cobalt LLC. (25-10345)                           |

United States Bankruptcy Court for the District of Delaware

Official Form 410

Proof of Claim

12/24

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. With the exception of administrative expenses arising under 11 U.S.C. §503(b)(9), do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?  
 Name of the current creditor (the person or entity to be paid for this claim) \_\_\_\_\_  
 Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  
 No  
 Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Contact phone _____ Contact email _____  Uniform claim identifier (if you use one): _____	Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Contact phone _____ Contact email _____

4. Does this claim amend one already filed?  
 No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  
 No  
 Yes. Who made the earlier filing? \_\_\_\_\_

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_ \_

7. How much is the claim? \$ \_\_\_\_\_. Does this amount include interest or other charges?  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
 Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured?  No  
 Yes. The claim is secured by a lien on property.

**Nature of property:**  
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_

**Basis for perfection:** \_\_\_\_\_  
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)

**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_

**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  
 Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  
 Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

No

Yes. Check one:

<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	Amount entitled to priority \$ _____
<input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(____) that applies.	\$ _____

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

No

Yes. Indicate the amount of your claim arising from the value of any goods received by the Debtor within twenty (20) days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

**Part 3: Sign Below**

**The person completing this proof of claim must sign and date it. FRBP 9011(b).**

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

**A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.**

*Check the appropriate box:*

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date \_\_\_\_\_  
MM / DD / YYYY

\_\_\_\_\_  
Signature

**Print the name of the person who is completing and signing this claim:**

Name \_\_\_\_\_  
First name Middle name Last name

Title \_\_\_\_\_

Company \_\_\_\_\_  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_  
Number Street

City State ZIP Code

Contact phone \_\_\_\_\_ Email \_\_\_\_\_