

Fill in this information to identify the case:Debtor Avant Gardner, LLCUnited States Bankruptcy Court for the: _____ District of Delaware
(State)Case number 25-11443**Modified Official Form 410
Proof of Claim****04/25**

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. 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 or 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? | A Entretenimiento Musical NA, Inc. | |
| | Name of the current creditor (the person or entity to be paid for this claim) | |
| | Other names the creditor used with the debtor <u>Elrow</u> | |
| 2. Has this claim been acquired from someone else? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____ | |
| 3. Where should notices and payments to the creditor be sent? | Where should notices to the creditor be sent? A Entretenimiento Musical NA, Inc. Blanca Alberich Porta DCODE LEGAL ADVISORS, S.L.P. C. de Santa Eulàlia 5, 1er 4a Barcelona, Spain 08012, Spain | Where should payments to the creditor be sent? (if different) A Entretenimiento Musical NA, Inc. Attn: Juan Arnau 1719 East 12th Street Brooklyn, NY 11229, USA |
| Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) | Contact phone <u>+34 648 680 283</u> Contact email <u>blanca@dcodelegal.com</u> | Contact phone _____ Contact email <u>juanitoarnau@elrowfamily.com</u> |
| (see summary page for notice party information) | | |
| Uniform claim identifier (if you use one): _____ | | |
| 4. Does this claim amend one already filed? | <input checked="" type="checkbox"/> No <input type="checkbox"/> 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? | <input checked="" type="checkbox"/> No <input type="checkbox"/> 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? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: __ __ __ __ |
| 7. How much is the claim? | \$ <u>84,042.51</u> Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> 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. <u>See attached Addendum</u> |
| 9. Is all or part of the claim secured? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature or property: <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> 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 amount 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) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable |
| 10. Is this claim based on a lease? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____ |
| 11. Is this claim subject to a right of setoff? | <input checked="" type="checkbox"/> No <input type="checkbox"/> 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 all that apply:

☐ 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

\$ _____

☐ Up to \$3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$17,150*) 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).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/28 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 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 acknowledgement 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 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 10/30/2025
MM / DD / YYYY

/s/Blanca Alberich Porta
Signature

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

Name Blanca Alberich Porta
First name Middle name Last name

Title _____

Company DCODE LEGAL ADVISORS, S.L.P.
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____ Email _____



Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (866) 523-2951 | International (781) 575-2140

| | | |
|--|---|----------------------------------|
| Debtor: 25-11443 - Avant Gardner, LLC District: District of Delaware | | |
| Creditor: A Entretenimiento Musical NA, Inc. Blanca Alberich Porta DCODE LEGAL ADVISORS, S.L.P. C. de Santa Eulàlia 5, 1er 4a Barcelona, Spain, 08012 Spain Phone: +34 648 680 283 Phone 2: Fax: Email: blanca@dcodelegal.com | Has Supporting Documentation: Yes, supporting documentation successfully uploaded Related Document Statement: | |
| | Has Related Claim: No Related Claim Filed By: | |
| | Filing Party: Authorized agent | |
| Disbursement/Notice Parties: <div style="display: flex; justify-content: space-between;"> <div> A Entretenimiento Musical NA, Inc. Attn: Juan Arnau 1719 East 12th Street Brooklyn, NY, 11229 USA Phone: Phone 2: Fax: E-mail: juanitoarnau@elrowfamily.com DISBURSEMENT ADDRESS </div> <div> Mark D. Olivere Chipman Brown Cicero and Cole, LLP Hercules Plaza 1313 North Market Street, Suite 5400 Wilmington, DE, 19801 Phone: 302-295-0191 Phone 2: Fax: E-mail: olivere@chipmanbrown.com </div> </div> | | |
| Other Names Used with Debtor: Elrow | Amends Claim: No Acquired Claim: No | |
| Basis of Claim: See attached Addendum | Last 4 Digits: No | Uniform Claim Identifier: |
| Total Amount of Claim: 84,042.51 | Includes Interest or Charges: No | |
| Has Priority Claim: No | Priority Under: | |
| Has Secured Claim: No Amount of 503(b)(9): No Based on Lease: No Subject to Right of Setoff: No | Nature of Secured Amount: Value of Property: Annual Interest Rate: Arrearage Amount: Basis for Perfection: Amount Unsecured: | |
| Submitted By: Blanca Alberich Porta on 30-Oct-2025 1:45:02 p.m. Pacific Time Title: Company: DCODE LEGAL ADVISORS, S.L.P. | | |

Your claim can be filed electronically on Verita's website at <https://www.veritaglobal.net/AGDP>

United States Bankruptcy Court for the District of Delaware

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- | | | |
|---|--|---|
| <input type="checkbox"/> AG Management Pool LLC (Case No. 25-11445) | <input checked="" type="checkbox"/> Avant Gardner, LLC (Case No. 25-11443) | <input type="checkbox"/> Made Event LLC (Case No. 25-11442) |
| <input type="checkbox"/> AGDP Holding Inc. (Case No. 25-11446) | <input type="checkbox"/> EZ Festivals LLC (Case No. 25-11444) | <input type="checkbox"/> Reynard Productions, LLC (Case No. 25-11447) |

Modified Official Form 410

Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or 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.

Part 1: Identify the Claim

| | | | |
|--|---|--|--|
| 1. Who is the current creditor? | A Entretenimiento Musical NA, Inc. Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor <u>Elrow</u> | | |
| 2. Has this claim been acquired from someone else? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____ | | |
| 3. Where should notices and payments to the creditor be sent? | Where should notices to the creditor be sent? | Where should payments to the creditor be sent? (if different) | |
| Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) | Blanca Alberich Porta DCODE LEGAL ADVISORS, S.L.P. | A Entretenimiento Musical NA, Inc. Attn: Juan Arnau | |
| | Name C. de Santa Eulàlia 5, 1er 4a | Name 1719 East 12th Street | |
| | Number Street 08012 Barcelona | Number Street Brooklyn NY 11229 | |
| | City State ZIP Code Spain | City State ZIP Code USA | |
| | Country | Country | |
| | Contact phone +34 648 680 283 | Contact phone _____ | |
| | Contact email blanca@dcodelegal.com legal@elrowfamily.com | Contact email juanitoarnau@elrowfamily.com pilar.tarrason@elrowfamily.com tomas.mundt@elrowfamily.com | |
| Uniform claim identifier (if you use one): _____ | | | |
| 4. Does this claim amend one already filed? | <input checked="" type="checkbox"/> No <input type="checkbox"/> 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? | <input checked="" type="checkbox"/> No <input type="checkbox"/> 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?
\$ 84,042.51 . 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.

See attached Addendum

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 amount 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)?

☒ No

☐ Yes. Check all that apply:

Amount entitled to priority

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

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$17,150*) 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).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/28 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 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 acknowledgement 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 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

10/30/2025
MM / DD / YYYY

Signature

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

Name Blanca Alberich Porta

First name

Middle name

Last name

Title

Company

DCODE LEGAL ADVISORS, S.L.P.

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

Address

C. de Santa Eulàlia 5, 1er 4a

Number

Street

Barcelona

City

State

ZIP Code

Country

Spain

Contact phone

+34 648 680 283

Email

blanca@dcodelegal.com

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

In re:

AGDP HOLDING INC., *et al.*,

Debtors¹.

Chapter 11

Case No. 25-11446 (MFW)

(Jointly Administered)

**ADDENDUM TO PROOF OF CLAIM OF
A ENTRETENIMIENTO MUSICAL NA, INC. a/k/a ELROW**

I. NOTICES RESPECTING THIS CLAIM

All notices representing this claim must be served upon the following persons (the “**Notice Parties**”):

Mark D. Olivere, Esquire
Chipman Brown Cicero & Cole, LLP
Hercules Plaza
1313 North Market Street
Suite 5400
Wilmington, Delaware 19801
Telephone: (302) 295-0191
Email: olivere@chipmanbrown.com

-and-

Blanca Alberich Porta
DCODE LEGAL ADVISORS, S.L.P.
C. de Santa Eulàlia 5, 1er 4a
08012 Barcelona
Telephone: +34 648 680 283
Email: blanca@dcodelegal.com

¹ The Debtors in these chapter 11 cases, together with the last four digits of the Debtors’ federal tax identification number, are AGDP Holding Inc. (6504); Avant Gardner, LLC (6504); AG Management Pool LLC (9962); EZ Festivals LLC (8854); Made Event LLC (6272); and Reynard Productions, LLC (5431). The Debtors’ service address is 140 Stewart Ave, Brooklyn, NY 11237, Attn: General Counsel.

II. NATURE AND DETAIL OF CLAIM

A Entretenimiento Musical NA, Inc. a/k/a Elrow (the “**Claimant**” or “**Elrow**”) submits this proof of claim in the amount of at least \$84,042.51, plus legal fees, costs and expenses in an amount to be determined, for amounts due to Elrow from debtor Avant Gardner, LLC (the “**Debtor**” or “**Avant**” and together with Elrow, the “**Parties**”) in connection with that certain *Event Space License Agreement* dated July 16, 2025 (as amended, the “**License Agreement**”) as detailed in this Addendum.

On August 4, 2025 (the “**Petition Date**”), Avant and its affiliates (together, the “**Debtors**”) filed voluntary petitions for relief under Chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

Prior to the Petition Date, Elrow, as “Licensee,” and Avant, as “Licensor,” entered into that certain *Event Space License Agreement* dated December 9, 2024 (the “**2024 Agreement**”) in connection with the license and use of certain event space (the “**Event Space**”) consisting of The Brooklyn Mirage, Great Hall (lounge only), and Kings Hall, located at 140 Stewart Avenue, Brooklyn, New York (the “**Property**”) in connection with an event known as “Elrow NYC: Summer Festival 2025”.

Subsequently, as a result of certain breaches by Avant in connection with the 2024 Agreement, the Parties entered into that certain *Settlement Agreement and Release* (the “**Settlement**”), dated as of July 16, 2025. Concurrently, the Parties entered into the License Agreement, which among other things (i) amended and superseded the 2024 Agreement, (ii) reduced the Event Space, and (iii) attached and incorporated the Settlement. Each of the 2024 Agreement, the 2025 Agreement and the Settlement contain express confidentiality provisions. Pursuant to the License Agreement, \$84,042.51 remains outstanding and owing to Elrow as of the Petition Date.

To the extent the Debtor asserts claims against Claimant of any kind, Claimant reserves the right to assert that such claims are subject to rights of setoff and/or recoupment, which rights are treated as secured claims under sections 506 and 553 of the Bankruptcy Code, and similar state and federal laws as well as in equity. To the extent that the Debtor or any other party take any action that would give rise to a counterclaim or other rights or claims Claimant may have against the Debtor, Claimant reserves all of its rights.

III. SETOFF AND OTHER RIGHTS AND DEFENSES

To the extent Claimant has certain equitable rights or other rights, including without limitation, the rights of recoupment, setoff and subrogation, such rights are expressly asserted hereby, and Claimant reserves all of its rights and preserves all defenses in connection therewith. Claimant additionally reserves all of its rights with respect to any provision of any order setting bar dates for filing proofs of claim in these cases, any order confirming any plan, or any order in the Debtor’s bankruptcy cases that may purport to discharge Claimant’s setoff, recoupment, or other equitable rights.

IV. RESERVATION OF RIGHTS

Claimant is currently investigating the elements of the claims asserted herein and this proof of claim is being filed, in part, as a protective proof of claim, and is filed to protect Claimant from the potential forfeiture of any and all rights against the Debtor. The filing of this proof of claim shall not constitute: (a) a waiver or release by Claimant of the rights or remedies of Claimant against the Debtor or any other person or property; (b) a waiver by Claimant to contest the jurisdiction of this Court with respect to the subject matter of the claims asserted in this proof of claim, any objection or other proceeding commenced with respect thereto or any other proceeding commenced in this case against or otherwise involving Claimant; (c) a waiver of the right to move to withdraw the jurisdictional reference, or otherwise to challenge the jurisdiction of this Court; (d) a waiver or relinquishment of rights with respect to the automatic stay that currently is in force and effect in the chapter 11 case of Claimant pursuant to section 362 of the Bankruptcy Code; (e) a waiver of the right to assert a different or enhanced classification or priority in respect of the claims asserted herein; or (f) an election of remedies or choice of law.

Claimant reserves the right to amend and/or supplement this proof of claim at any time and in any manner and to file proofs of claim for additional claims which may be based on the respective rights and obligations arising under the relationship described herein or the same events and circumstances described herein. In addition, Claimant reserves the right to attach or bring forth additional documentation supporting its claims and additional documents that may become available after further investigation and discovery.

V. SUPPORTING DOCUMENTATION

The 2024 Agreement, the License Agreement, and the Settlement, each contain express confidentiality provisions prohibiting their disclosure. Due to the inclusion of confidential and/or sensitive commercial information, the supporting documents have not been attached to this Addendum. Copies of these supporting documents are believed to be in the possession of the Debtors and their counsel and may be obtained by contacting the Notice Parties.