

Exhibit B

Debtor: Vyaire Medical, Inc.

UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

Case Number: 24-11217

FILED**Claim No. 132****August 01, 2024**By Omni Claims Agent
For U.S. Bankruptcy Court
District of Delaware**Official Form 410****Proof of Claim**

04/22

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 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.

Carefully read instructions included with this Proof of Claim before completing.

Part 1: Identify the Claim

1. Who is the current creditor?		Quad DBC Holdings LLC 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)
	Beejal Northrup		
	111 Innovation Drive		
	Irvine, CA 92617		
	Contact Phone 949.720.5546	Contact Phone _____	
Contact email bnorthrup@irvinecompany.com	Contact email _____		
Uniform claim identifier for electronic payments in chapter 13 (if you use one) _____			
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?	\$ 24,439,923.00	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 Landlord Claim, See 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 <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> ☐ 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.	\$ 713,051.00
11. Is this claim subject to a right of setoff?	☒ No ☐ Yes Identify the property: _____		
12. Is this claim for the value of goods received by the debtor within 20 days before the commencement date of this case (11 U.S.C. § 503(b)(9)).?	☒ No ☐ Yes Amount of 503(b)(9) Claim: \$ _____		

13. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?☒ No☐ Yes *Check one:***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 \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ 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).

\$ _____

☐ 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 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

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)(2) 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 the 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 8/2/2024
MM / DD / YYYY

Beejal Northrup
Signature

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

Name Beejal Northrup
First Name Middle Name Last Name

Title S.V.P. Division Finance Officer

Company The Irvine Company
Identify the corporate servicer as the company if the authorized agent is a servicer.
111 Innovation Drive

Address Irvine, CA 92617

Contact Phone 949.720.5546 Email bnorthrup@irvinecompany.com

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

In re: VYAIRE MEDICAL, INC., <i>et al.</i> Debtors	Chapter 11 Case No. 24-11217(BLS) (Jointly Administered)
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ADDENDUM TO PROOF OF CLAIM

1. Landlord and debtor, Vyair Medical Inc., (“Tenant”) are parties to an unexpired lease of two buildings of non-residential real property located at 510 Technology Drive and 520 Technology Drive in Irvine, California, (the “Lease”). On the Petition Date herein, Tenant was in default under the Lease.

2. With respect to 510 Technology Drive, the Tenant owes \$295,084.00 in unpaid petition rent. Furthermore, the Tenant owes the following non-rent costs stemming from the Lease and related to 510 Technology Drive: (i) unamortized costs related to tenant improvements, letters of credit, and free rent in the amount of \$4,174,499.00 and (ii) restoration costs in the amount of \$3,809,142.00. The twelve months of lease damages totals \$3,910,329.00.

3. The total claim related to 510 Technology Drive is \$12,189,054.00.

4. With respect to 520 Technology Drive, the Tenant owes \$417,967.00 in unpaid petition rent. Furthermore, the Tenant owes the following non-rent costs stemming from the Lease and related to 520 Technology Drive: (i) unamortized costs related to tenant improvements, letters of credit, and free rent in the amount of \$1,904,724.00; (ii) restoration costs in the amount of \$535,663.00; and (iii) building obligations in the amount of \$8,134,434.00. The twelve months of lease damages totals \$5,213,081.00.

5. The total claim related to 520 Technology Drive is \$16,205,869.00.

6. The 510 Technology Drive and 520 Technology Drive claims total \$28,394,923.00, plus an additional \$45,000.00 related to legal expenses.

7. An Escrow Agent, First American Trust FSP is holding \$4,000,000 of letter of credit proceeds in an escrow agreement on behalf of the Landlord's lender, Northwestern Mutual Life Insurance Co. for the future build-out of the 520 Technology Drive Premises. The Landlord has calculated the \$4,000,000 held in escrow as a reduction of the Landlord's claim, thereby bringing the Landlord's claim down to **\$24,439,923.00**

8. This proof of claim is without prejudice to amend or update the claim as is appropriate. The Landlord explicitly reserves and preserves all rights.