

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

In re:  MADE EVENT LLC,  Debtors.	Chapter 11  Case No. 25-11442 ([•])  TAX ID: 88-2156272
In re:  AVANT GARDNER, LLC,  Debtors.	Chapter 11  Case No. 25-11443 ([•])  TAX ID: 81-2596504
In re:  EZ FESTIVALS LLC,  Debtors.	Chapter 11  Case No. 25-11444 ([•])  TAX ID: 88-2168854
In re:  AG MANAGEMENT POOL LLC,  Debtors.	Chapter 11  Case No. 25-11445 ([•])  TAX ID: 33-1429962
In re:  AGDP HOLDING INC.,  Debtors.	Chapter 11  Case No. 25-11446 ([•])  TAX ID: 82-1406504
In re:  REYNARD PRODUCTIONS, LLC,  Debtors.	Chapter 11  Case No. 25-11447 ([•])  TAX ID: 47-5145431



**DEBTORS' MOTION FOR ENTRY OF AN ORDER, PURSUANT TO BANKRUPTCY  
RULE 1015 AND LOCAL RULE 1015-1, AUTHORIZING THE JOINT  
ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES**

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The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully state the following in support of this motion (the “Motion”):<sup>1</sup>

**RELIEF REQUESTED**

1. The Debtors seek entry of an order (the “Proposed Order”), substantially in the form attached hereto as **Exhibit A**, directing the joint administration of the Debtors’ chapter 11 cases and the consolidation thereof for procedural purposes only.

**JURISDICTION AND VENUE**

2. The United States Bankruptcy Court for the District of Delaware (the “Court”) has 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. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). The Debtors confirm their consent, pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), to the entry of a final order by the Court in connection with this Motion, to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

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<sup>1</sup> A detailed description of the Debtors and their businesses, and the facts and circumstances supporting this Motion and the Debtors’ chapter 11 cases, are set forth in greater detail in the *Declaration of Gary Richards in Support of Chapter 11 Petitions and First Day Pleadings* (the “First Day Declaration”), filed contemporaneously herewith. Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the First Day Declaration.

4. The statutory and legal bases for the relief requested in this Motion are section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), and rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rule 1015-1.

### **BACKGROUND OF THE DEBTORS**

5. The Debtors operate a multi-space entertainment venue complex, specializing in large-scale live entertainment—concerts, festivals, corporate functions, and multimedia events—and is known for state-of-the-art audiovisual production, including a 2022 upgrade featuring one of the world’s highest-resolution video walls. The Debtors focus on industry-leading production capabilities, immersive audiovisual experiences, and status as one of North America’s largest standing-room-only entertainment venues.

6. On the date hereto (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the Court. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No party has requested the appointment of a trustee or examiner in these cases, and no statutory committee has been appointed.

7. Additional information regarding the Debtors’ businesses, capital structures and circumstances preceding the Petition Date may be found in the First Day Declaration.

### **RELIEF REQUESTED**

8. By this Motion, the Debtors seek entry of the Proposed Order authorizing, but not directing, the joint administration of these chapter 11 cases and the consolidation thereof for procedural purposes only.

9. Many, if not virtually all, of the motions, applications, hearings, and orders that will arise in these chapter 11 cases will jointly affect all of the Debtors. For this reason, the Debtors respectfully submit that the interests of the Debtors, their creditors, and other parties in interest

would be best served by the joint administration of these chapter 11 cases. To optimally and economically administer the Debtors' chapter 11 cases, the Debtors believe that such cases should be jointly administered, for procedural purposes only, under the case number assigned to Debtor AGDP Holding Inc. ("AGDP").

10. The Debtors also request that the Clerk of the Court maintain one (1) file and one (1) docket for all of the Debtors' chapter 11 cases, which file and docket shall be the file and docket for AGDP. In addition, the Debtors propose that the caption of these chapter 11 cases be modified as follows:

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

In re:

AGDP HOLDING INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-11446 ([•])

(Jointly Administered)

<sup>1</sup> 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.

11. The Debtors also seek the Court's direction that a notation, substantially similar to the following proposed docket entry, be entered on the docket of each of these chapter 11 cases to reflect the joint administration of these chapter 11 cases:

An order has been entered in this case directing the consolidation and joint administration for procedural purposes only of the chapter 11 cases of AGDP Holding Inc., Avant Gardner, LLC, AG Management Pool LLC, EZ Festivals LLC, Made Event LLC, and Reynard Productions, LLC. **The docket in the chapter 11 case of AGDP Holding Inc., Case No. 25-11446 (\_\_\_), should be consulted for all matters concerning this case.**

**BASIS FOR RELIEF REQUESTED**

12. Pursuant to Bankruptcy Rule 1015(b), if two or more petitions are pending in the same court by or against a debtor and an affiliate, “the [C]ourt may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). Local Rule 1015-1 similarly provides for joint administration of chapter 11 cases when the facts demonstrate that joint administration “is warranted and will ease the administrative burden for the Court and the parties.” Del. Bankr. L.R. 1015-1. In these chapter 11 cases, and as set forth in the First Day Declaration, the Debtors are “affiliates,” as that term is defined in section 101(2) of the Bankruptcy Code.

13. Additionally, the First Day Declaration establishes that the joint administration of the Debtors’ respective estates is warranted and will ease the administrative burden on the Court and all parties in interest in these chapter 11 cases. Joint administration will also permit the Clerk of the Court to utilize a single docket for these chapter 11 cases, and to combine notices to creditors and other parties in interest in the Debtors’ respective cases. Because there will likely be numerous motions, applications, and other pleadings filed in these chapter 11 cases that will affect all of the Debtors, joint administration will permit counsel for all parties in interest to include all of the Debtors’ cases in a single caption for the numerous documents that are likely to be filed and served in these cases. Joint administration will also enable parties in interest in each of the Debtors’ cases to stay apprised of all of the various matters before the Court.

14. Joint administration will not prejudice or adversely affect the rights of the Debtors’ creditors because the relief sought herein is purely procedural and is not intended to affect substantive rights. Joint administration will also significantly reduce the volume of paper that otherwise would be filed with the Clerk of the Court, render the completion of various administrative tasks less costly, and provide for greater efficiencies. Moreover, the relief requested

by this Motion will also simplify supervision of the administrative aspects of these cases by the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”).

15. For these reasons, the Debtors submit that the relief requested herein is in the best interests of the Debtors, their estates, and their creditors, and therefore should be granted.

**NOTICE**

16. Notice of this Motion has been provided to: (a) the Office of the United States Trustee for the District of Delaware; (b) the holders of the thirty (30) largest unsecured claims against the Debtors; (c) Alter Domus (US) LLC, in its capacity as administrative agent and collateral agent under the Prepetition Financing Agreement and the DIP Facility; (d) counsel to the DIP Lenders and Prepetition Term Loan Lender; (e) counsel to LiveStyle; (f) the United States Attorney’s Office for the District of Delaware; (g) the Internal Revenue Service; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002. Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-1(m). The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

*[Remainder of the page intentionally left blank.]*

WHEREFORE, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto, granting the relief requested herein and granting such other relief as is just and proper.

Dated: August 4, 2025  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,  
LLP**

*/s/ Evan Saruk*

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*Proposed Counsel to the Debtors and Debtors in  
Possession*

**Exhibit A**

**Proposed Order**



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

<p>In re:</p> <p>MADE EVENT LLC,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-11442 ([•])</p> <p>TAX ID: 88-2156272</p>
<p>In re:</p> <p>AVANT GARDNER, LLC,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-11443 ([•])</p> <p>TAX ID: 81-2596504</p>
<p>In re:</p> <p>EZ FESTIVALS LLC,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-11444 ([•])</p> <p>TAX ID: 88-2168854</p>
<p>In re:</p> <p>AG MANAGEMENT POOL LLC,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-11445 ([•])</p> <p>TAX ID: 33-1429962</p>
<p>In re:</p> <p>AGDP HOLDING INC.,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-11446 ([•])</p> <p>TAX ID: 82-1406504</p>
<p>In re:</p> <p>REYNARD PRODUCTIONS, LLC,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-11447 ([•])</p> <p>TAX ID: 47-5145431</p>

**ORDER PURSUANT TO BANKRUPTCY RULE 1015  
AND LOCAL RULE 1015-1, AUTHORIZING THE JOINT  
ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES**

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Upon the motion (“Motion”)<sup>1</sup> of AGDP Holding Inc., and its debtor affiliates, as debtors and debtors in possession (collectively, the “Debtors”), for entry of an order (this “Order”) authorizing, but not directing, the joint administration of the Debtors’ chapter 11 cases for procedural purposes only; and upon consideration of the First Day Declaration and the record of these chapter 11 cases; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 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 matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this proceeding and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and opportunity for a hearing on the Motion having been given; and the relief requested in the Motion being in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The relief requested in the Motion is GRANTED on a final basis as set forth herein.
2. The Debtors’ chapter 11 cases shall be consolidated for procedural purposes only and shall be jointly administered in accordance with the provisions of Bankruptcy Rule 1015 and

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to them in the Motion.

Local Rule 1015-1. The Debtors' chapter 11 cases are not being substantively consolidated pursuant to this Order.

3. The Clerk of the Court shall maintain one file and one docket for the Debtors' chapter 11 cases, which file and docket shall be the file and docket for the chapter 11 case of AGDP Holding Inc., Case No. 25-11446 (\_\_\_\_).

4. All pleadings filed in the Debtors' chapter 11 cases shall bear a consolidated caption in the following form:

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

In re:	Chapter 11
AGDP HOLDING INC., <i>et al.</i> , <sup>1</sup>	Case No. 25-11446 ([•])
Debtors.	(Jointly Administered)

<sup>1</sup> 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.

5. The foregoing caption satisfies the requirements of the first sentence of section 342(c)(1) of the Bankruptcy Code.

6. All original pleadings shall be captioned as indicated in the preceding decretal paragraph, and the Clerk of the Court shall make a docket entry in the docket of each of these chapter 11 cases substantially as follows:

An order has been entered in this case directing the consolidation and joint administration for procedural purposes only of the chapter 11 cases of AGDP Holding Inc., Avant Gardner, LLC, AG Management Pool LLC, EZ Festivals LLC, Made Event LLC, and Reynard Productions, LLC. **The docket in the chapter 11 case of**

**AGDP Holding Inc., Case No. 25-11446 (\_\_\_), should be consulted for all matters concerning this case.**

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.