

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: EZ Festivals, LLC, *et al.*,
Debtors

Chapter 11

Case Nos. 1:25-BK-11444-MFW
1:25-BK-11442-MFW
1:25-BK-11443-MFW
1:25-BK-11446-MFW

**NOTICE OF APPEARANCE &
REQUEST FOR NOTICES**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Bankr. P. 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Jonathan Corbett, Esq., hereby appears as counsel for Claimants Alexandra Avchukov, Quentin Chappat, and Sandra Maesta Pereira, and a class of persons similarly situated, see *Brockmole et al. v. EZ Festivals LLC et al.*, 1:23-CV-8106-MMG-JW (S.D.N.Y.) (the “Class Group”), in the above-captioned cases.

PLEASE TAKE FURTHER NOTICE that all notices and other papers are requested to be served upon the undersigned counsel:

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PLEASE TAKE FURTHER NOTICE that the filing of this Notice shall not be deemed or construed to constitute a waiver of any substantive or procedural rights of the Class Group including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District



Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Class Group is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Class Group expressly states otherwise, the Class Group does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: Wilmington, DE

August 21st, 2025

Respectfully submitted,

/s/Jonathan Corbett
Jonathan Corbett, Esq. (CA Bar 325608)¹
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¹ Foreign counsel appearing pursuant to Del. Bankr. L.R. 9010-1(e)(iii)