

**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 (MFW)

(Jointly Administered)

AGDP HOLDING INC., *et al.*,

Plaintiff,

v.

TVT Capital Source LLC, Insta Funding LLC,  
and Pinnacle Business Funding LLC,

Defendants.

Adv. Proc. No. 25-51803 (MFW)

**SUMMONS AND NOTICE OF PRETRIAL  
CONFERENCE IN AN ADVERSARY PROCEEDING**

YOU ARE SUMMONED and required to file a motion or answer to the amended complaint which is attached to this summons with the clerk of the bankruptcy court within 30 days after the date of issuance of this summons, except that the United States and its offices and agencies shall file a motion or answer to the amended complaint within 35 days.

Address of Clerk: 824 Market Street, 3<sup>rd</sup> Floor  
Wilmington, Delaware 19801

At the same time, you must also serve a copy of the motion or answer upon the plaintiff's attorneys.

<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.



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**Names and Addresses of Plaintiff's Attorneys:**

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Edmon L. Morton, Esq.  
Sean M. Beach, Esq.  
Kevin A. Guerke, Esq.  
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1000 North King Street  
Rodney Square  
Wilmington, Delaware 19801  
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If you make a motion, your time to answer is governed by Fed. R. Bankr. P. 7012.

YOU ARE NOTIFIED that a pretrial conference of the proceeding commenced by the filing of the amended complaint will be held at the following time and place.

Address: United States Bankruptcy Court  
824 Market Street  
5th Floor, Courtroom 4  
Wilmington, Delaware 19801

Date and Time: To be determined.

**IF YOU FAIL TO RESPOND TO THIS SUMMONS, YOUR FAILURE WILL BE DEEMED TO BE YOUR CONSENT TO ENTRY OF A JUDGMENT BY THE BANKRUPTCY COURT AND JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE AMENDED COMPLAINT.**



Dated: August 22, 2025

/s/ Stephen L. Grant  
Clerk of the Court

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**NOTICE OF DISPUTE RESOLUTION ALTERNATIVES**

As a party to litigation, you have a right to adjudication of your matter by a judge of this Court. Settlement of your case, however, can often produce a resolution more quickly than appearing before a judge. Additionally, settlement can also reduce the expense, inconvenience, and uncertainty of litigation.

There are dispute resolution structures, other than litigation, that can lead to resolving your case. Alternative Dispute Resolution (ADR) is offered through a program established by this Court. The use of these services is often productive and effective in settling disputes. **The purpose of this Notice is to furnish general information about ADR.**

The ADR structures used most often are mediation, early-neutral evaluation, mediation/arbitration and arbitration. In each, the process is presided over by an impartial third party, called the “neutral.”

In mediation and early-neutral evaluation, an experienced neutral has no power to impose a settlement on you. It fosters an environment where offers can be discussed and exchanged. In the process, together, you and your attorney will be involved in weighing settlement proposals and crafting a settlement. The Court in its Local Rules requires all ADR processes, except threat of a potential criminal action, to be confidential. You will not be prejudiced in the event a settlement is not achieved because the presiding judge will not be advised of the content of any of your settlement discussions.

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Mediation/arbitration is a process where you submit to mediation and, if it is unsuccessful, agree that the mediator will act as an arbitrator. At that point, the process is the same as arbitration. You, through your counsel, will present evidence to a neutral, who issues a decision. If the matter in controversy arises in the main bankruptcy case or arises from a subsidiary issue in an adversary proceeding, the arbitration, though voluntary, may be binding. If a party requests *de novo* review of an arbitration award, the judge will rehear the case.

**Your attorney can provide you with additional information about ADR and advise you as to whether and when ADR might be helpful in your case.**

Date: August 22, 2025

/s/ Stephen L. Grant  
*Clerk of the Court*

**CERTIFICATE OF SERVICE**

I, Kevin A. Guerke, certify that I am, and at all times during the service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made. I further certify that the service of this Summons, a copy of the Amended Complaint, and a Notice of Dispute Resolution Alternatives was made on August 22, 2025 upon the below parties in the manner indicated.

TVT Capital Source LLC  
Attn: Brody Valerga  
395 S Main Street, Ste. 201  
Alpine, UT 84004  
(Overnight Mail)

TVT Capital Source LLC  
Attn: Officer, Director, or Managing Agent  
881 Baxter Drive, Ste. 100  
South Jordan, UT 84095  
(Overnight Mail)

TVT Capital Source LLC  
Attn: Officer, Director, or Managing Agent  
1407 Broadway  
New York, NY 10018  
(Overnight Mail)

Andrew Fellus  
4 Green Dr.  
Roslyn, NY 11576  
(Overnight Mail)

Pinnacle Business Funding LLC  
Attn: Officer, Director, or Managing Agent  
2818 Baneberry CT  
Baltimore, MD 21209  
(Overnight Mail)

White Star Funding Inc d/b/a TVT Cap  
Attn: Officer, Director, or Managing Agent  
4300 Biscayne Blvd., Ste. 203  
Miami, FL 33137  
(Overnight Mail)

Pinnacle Business Funding LLC  
Attn: Officer, Director, or Managing Agent  
75-19 147th Street  
Flushing, NY 11367  
(Overnight Mail)

Pinnacle Business Funding LLC  
Attn: Secretary of State  
One Commerce Plaza, 99 Washington Ave.  
Albany, New York  
(Hand Delivered)

Pinnacle Business Funding LLC  
Attn: Officer, Director, or Managing Agent  
1777 Reisterstown Rd.  
Pikesville, MD 21209  
(Overnight Mail)

Pinnacle Business Funding LLC  
Attn: Officer, Director, or Managing Agent  
1202 Avenue U Ste 1115  
Brooklyn, NY 11229  
(Overnight Mail)

Insta Funding LLC  
Attn: Officer, Director, or Managing Agent  
6 Landmark Square, 4<sup>th</sup> Floor  
Stamford, CT 06901  
(Overnight Mail)

Insta Funding LLC  
Attn: Officer, Director, or Managing Agent  
3363 NE 163rd Street, Suite 606  
North Miami Beach, FL 33160  
(Overnight Mail)

Insta Funding LLC  
Attn: Officer, Director, or Managing Agent  
2389 Main St., Ste. 100  
Glastonbury, CT, 06033  
(*Overnight Mail*)

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

Date: August 22, 2025

/s/ Kevin A. Guerke  
Kevin A. Guerke (No. 4096)  
Young Conaway Stargatt & Taylor, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801