

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

In re:

AGDP HOLDING INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11446 (MFW)

(Jointly Administered)

Ref. Docket No. 64

**FIRST SUPPLEMENTAL DECLARATION OF
SEAN M. BEACH IN SUPPORT OF THE
DEBTORS' APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF
YOUNG CONAWAY STARGATT & TAYLOR, LLP AS COUNSEL
FOR THE DEBTORS, EFFECTIVE AS OF THE PETITION DATE**

I, Sean M. Beach, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner in the law firm of Young Conaway Stargatt & Taylor, LLP ("Young Conaway"), with principal offices at Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, and have been duly admitted to practice in the State of Delaware, the State of New Jersey, and the State of New York, as well as the United States District Courts for the District of Delaware, the District of New Jersey, and the Southern District of New York. I submit this declaration (this "Supplemental Declaration") to supplement the disclosures contained in my initial declaration (the "Initial Declaration"), attached as Exhibit A to the *Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Young Conaway Stargatt &*

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.



Taylor, LLP as Counsel for the Debtors, Effective as of the Petition Date [Docket No. 64] (the “Application”),² filed on August 14, 2025.

2. In the Initial Declaration, Young Conaway set forth and described the conflicts and connections search that it conducted and disclosed certain relationships to parties with an interest in these chapter 11 cases (the “Interested Parties”).

3. The purpose of this Supplemental Declaration is to provide additional information regarding Young Conaway’s representation of one of those Interested Parties, as follows:

- As set forth in the Initial Declaration, Young Conaway currently, and has in the past, represented Alter Domus. From 2019 to present, Young Conaway has represented Alter Domus in its capacity as an agent under various loan facilities. The work that Young Conaway has done or currently does for Alter Domus is wholly unrelated to these chapter 11 cases. With the exception of one matter that is ongoing, all of these matters have concluded.

4. In addition, as disclosed in the Application and the Initial Declaration, at the time the Application was filed Young Conaway held a balance of \$131,926.00 on account of the Restructuring Retainer. Young Conaway has completed its reconciliation of prepetition fees and expenses and the balance of the Restructuring Retainer is \$94,903.00, which Young Conaway will continue to hold as a general retainer as security for postpetition services and expenses.

5. Young Conaway will supplement this Supplemental Declaration, as necessary, with additional information or disclosures in the event that additional information is developed.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: August 28, 2025
Wilmington, Delaware

/s/ Sean M. Beach
Sean M. Beach