

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)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON SEPTEMBER 4, 2025 AT 2:00 P.M. (ET)**

****AS NO MATTERS ARE GOING FORWARD, THIS HEARING
HAS BEEN CANCELLED AT THE DIRECTION OF THE COURT****

ADJOURNED MATTERS

1. Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 12](#); 8/4/25]

Related Pleadings:

- a) Declaration of Stephen Golmont in Support of Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 14](#); 8/4/25]

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.

² Amended items appear in bold.



- b) Declaration of Jeffrey Gasbarra in Support of Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 15](#); 8/4/25]
- c) Notice of Filing of Agency Fee Letter [(SEALED) Docket No. 17, 8/4/25; (Redacted) [D.I. 18](#), 8/4/25]
- d) Interim Order [[D.I. 46](#); 8/5/25]
- e) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
- f) Certification of Counsel Submitting Second Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 116](#); 9/2/25]
- g) **Second Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 128](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET), as extended to September 4, 2025 for the Official Committee of Unsecured Creditors

Objections/Informal Responses: None to date.

Status: **A second interim order has been entered by the Court.** The hearing to consider approval of this motion on a final basis has been adjourned to September 11, 2025, at 2:00 p.m. (ET).

2. Debtors' Motion for Entry of (I) an Order (A) Approving Certain Bidding Procedures and the Form and Manner of Notice Thereof, (B) Authorizing the Debtors to Designate the Stalking Horse Bidder, (C) Scheduling an Auction and a Hearing on the Approval of the Sale of Some, All, or Substantially All of the Debtors' Assets, (D) Authorizing the Debtors to Enter into the Purchase Agreement(s), (E) Establishing Certain Assumption and Assignment Procedures and Approving the Manner of Notice Thereof, and (F) Granting Related Relief; and (II) an Order or Orders (A) Authorizing the Sale of Some, All, or Substantially All of the Debtors' Assets Free and Clear of Encumbrances, (B) Approving the Assumption and Assignment of the Potentially Assigned Contracts, and (C) Granting Related Relief [[D.I. 62](#); 8/14/25]

Related Pleadings:

- a) Declaration of Jason Cohen in Support of Debtors' Motion for Entry of (I) an Order (A) Approving Certain Bidding Procedures and the Form and Manner of Notice Thereof, (B) Authorizing the Debtors to Designate the Stalking Horse Bidder, (C) Scheduling an Auction and a Hearing on the Approval of the Sale of Some, All, or Substantially All of the Debtors' Assets, (D) Authorizing the Debtors to Enter into the Purchase Agreement(s), (E) Establishing Certain Assumption and Assignment Procedures and Approving the Manner of Notice Thereof, and (F) Granting Related Relief; and (II) an Order or Orders (A) Authorizing the Sale of Some, All, or Substantially All of the Debtors' Assets Free and Clear of Encumbrances, (B) Approving the Assumption and Assignment of the Potentially Assigned Contracts, and (C) Granting Related Relief [[D.I. 63](#); 8/14/25]
- b) Notice of Filing of Amendment to Stalking Horse APA [[D.I. 92](#); 8/22/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET), as extended to September 4, 2025 for the Official Committee of Unsecured Creditors

Objections/Informal Responses: None to date.

Status: This matter has been adjourned to September 11, 2025, at 2:00 p.m. (ET).

UNCONTESTED MATTERS WITH CERTIFICATIONS FILED

3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Taxes and Fees and (II) Granting Related Relief [[D.I. 5](#); 8/4/25]

Related Pleadings:

- a) Interim Order [[D.I. 36](#); 8/5/25]

- b) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
- c) Supplement to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Taxes and Fees and (II) Granting Related Relief [[D.I. 66](#); 8/14/25]
- d) Certification of Counsel [[D.I. 101](#); 9/2/25]
- e) Final Order [[D.I. 117](#); 9/2/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- f) Informal Response from the Official Committee of Unsecured Creditors

Status: A final order has been entered by the Court. No hearing is necessary.

4. Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Approving Proposed Adequate Assurance of Payment, (III) Establishing Procedures for Resolving Requests for Additional Assurance of Payment, and (IV) Granting Related Relief [[D.I. 6](#); 8/4/25]

Related Pleadings:

- a) Interim Order [[D.I. 37](#); 8/5/25]
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
- c) Certification of Counsel [[D.I. 102](#); 9/2/25]
- d) Final Order [[D.I. 118](#); 9/2/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- e) Objection of Consolidated Edison Company of New York, Inc. [[D.I. 56](#); 8/11/25]
- f) Notice of Withdrawal of Objection of Consolidated Edison Company of New York, Inc. [[D.I. 69](#); 8/15/25]

- g) Informal Response from the Official Committee of Unsecured Creditors

Status: A final order has been entered by the Court. No hearing is necessary.

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Their Obligations Under Prepetition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Enter into New Financing Agreements in the Ordinary Course of Business, and, (E) Continue the Workers' Compensation Program, and (II) Granting Related Relief [[D.I. 7](#); 8/4/25]

Related Pleadings:

- a) Interim Order [[D.I. 38](#); 8/5/25]
b) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
c) Certification of Counsel [[D.I. 103](#); 9/2/25]
d) Final Order [[D.I. 119](#); 9/2/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- e) Informal Response from the Official Committee of Unsecured Creditors

Status: A final order has been entered by the Court. No hearing is necessary.

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, but not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefit Programs and (II) Granting Related Relief [[D.I. 8](#); 8/4/25]

Related Pleadings:

- a) Interim Order [[D.I. 39](#); 8/5/25]
b) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
c) Certification of Counsel [[D.I. 104](#); 9/2/25]
d) Final Order [[D.I. 120](#); 9/2/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- e) Informal Response from the Official Committee of Unsecured Creditors
- f) Informal Response from the Office of the United States Trustee

Status: A final order has been entered by the Court. No hearing is necessary.

7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Critical Vendor Claims and PACA/PASA Claims; and (II) Granting Related Relief [[D.I. 9](#); 8/4/25]

Related Pleadings:

- a) Interim Order [[D.I. 40](#); 8/5/25]
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
- c) Certification of Counsel [[D.I. 105](#); 9/2/25]
- d) Final Order [[D.I. 121](#); 9/2/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- e) Informal Response from the Official Committee of Unsecured Creditors

Status: A final order has been entered by the Court. No hearing is necessary.

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Maintain and Administer Certain Customer Programs and Practices, (II) Authorizing Debtors to Pay and Honor Related Prepetition and Postpetition Obligations, and (III) Granting Related Relief [[D.I. 10](#); 8/4/25]

Related Pleadings:

- a) Interim Order [[D.I. 41](#); 8/5/25]
- b) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
- c) Certification of Counsel [[D.I. 106](#); 9/2/25]

- d) Final Order [[D.I. 122](#); 9/2/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- e) Informal Response from the Official Committee of Unsecured Creditors

Status: A final order has been entered by the Court. No hearing is necessary.

- 9. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing and Directing the Banks and Payment Processors to Cease Any Holds on, or Redirection of, Cash or Receivables of the Debtors, (II) Authorizing the Debtors to (A) Continue Use of Their Existing Cash Management System, Bank Accounts, and Business Forms, (B) Continue Intercompany Transactions, (C) Pay Related Obligations, and (D) Pay and Honor Processing Obligations, (III) Waiving Certain Investment and Deposit Guidelines, and (IV) Granting Related Relief [[D.I. 11](#); 8/4/25]

Related Pleadings:

- a) Declaration of Jeffrey Gasbarra in Support of Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 15](#); 8/4/25]
- b) Interim Order [[D.I. 42](#); 8/5/25]
- c) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
- d) Certification of Counsel [[D.I. 107](#); 9/2/25]
- e) **Final Order** [[D.I. 124](#); 9/2/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- f) Informal Response from the Official Committee of Unsecured Creditors
- g) Informal Response from the Office of the United States Trustee

Status: **A final order has been entered by the Court. No hearing is necessary.**

10. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) File Under Seal and (B) Redact Confidential Information in the Fee Letter and (II) Granting Related Relief [[D.I. 51](#); 8/7/25]

Related Pleadings:

- a) Notice of Filing of Agency Fee Letter [(SEALED) Docket No. 17, 8/4/25; (Redacted) [D.I. 18](#), 8/4/25]
- b) Certificate of No Objection [[D.I. 108](#); 9/2/25]
- c) **Order Authorizing (I) the Debtors to (A) File Under Seal and (B) Redact Confidential Information in the Fee Letter and (II) Granting Related Relief [[D.I. 125](#); 9/2/25]**

Objection Deadline: August 21, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

Status: **An order has been entered by the Court. No hearing is necessary.**

11. 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 [[D.I. 64](#); 8/14/25]

Related Pleadings:

- a) 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 [[D.I. 96](#); 8/28/25]
- b) Certification of Counsel [[D.I. 109](#); 9/2/25]
- c) **Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Counsel for the Debtors, Effective as of the Petition Date [[D.I. 126](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- d) Informal Response from the Office of the United States Trustee

Status: **An order has been entered by the Court. No hearing is necessary.**

12. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date [[D.I. 65](#); 8/14/25]

Related Pleadings:

- a) Certification of Counsel [[D.I. 110](#); 9/2/25]
- b) **Order Authorizing the Debtors to Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date [[D.I. 127](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- c) Informal Response from the Office of the United States Trustee

Status: **An order has been entered by the Court. No hearing is necessary.**

13. Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Triple P TRS, LLC as Restructuring Advisor and Triple P Securities, LLC as Investment Banker for the Debtors, Effective as of the Petition Date; (II) Waiving Certain Time-Keeping Requirements; and (III) Granting Related Relief [[D.I. 67](#); 8/14/25]

Related Pleadings:

- a) Supplemental Declaration of Jeffrey Gasbarra in Support of Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Triple P TRS, LLC as Restructuring Advisor and Triple P Securities, LLC as Investment Banker for the Debtors, Effective as of the Petition Date; (II) Waiving Certain Time-Keeping Requirements; and (III) Granting Related Relief [[D.I. 99](#); 8/29/25]
- b) Certification of Counsel [[D.I. 111](#); 9/2/25]
- c) **Order (I) Authorizing the Retention and Employment of Triple P TRS, LLC as Restructuring Advisor and Triple P Securities, LLC as Investment Banker for the Debtors, Effective as of the Petition Date; (II) Waiving Certain Time-Keeping Requirements; and (III) Granting Related Relief [[D.I. 129](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- d) Informal Response from the Office of the United States Trustee

Status: **An order has been entered by the Court. No hearing is necessary.**

- 14. Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules and Statements of Financial Affairs, and (II) Granting Related Relief [[D.I. 72](#); 8/18/25]

Related Pleadings:

- a) Certificate of No Objection [[D.I. 112](#); 9/2/25]
- b) **Order (I) Extending Time to File Schedules and Statements of Financial Affairs, and (II) Granting Related Relief [[D.I. 130](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

Status: **An order has been entered by the Court. No hearing is necessary.**

- 15. Debtors' Motion for Entry of an Order (I) Establishing Bar Dates for Filing Proofs of Prepetition Claims, Including Section 503(b)(9) Claims; (II) Approving the Form and Manner of Notice Thereof; and (III) Granting Related Relief [[D.I. 89](#); 8/21/25]

Related Pleadings:

- a) Certification of Counsel [[D.I. 113](#); 9/2/25]
- b) **Order (I) Establishing Bar Dates for Filing Proofs of Prepetition Claims, Including Section 503(b)(9) Claims; (II) Approving the Form and Manner of Notice Thereof; and (III) Granting Related Relief [[D.I. 131](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- c) Informal Response from the Office of the United States Trustee

Status: **An order has been entered by the Court. No hearing is necessary.**

16. Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief [[D.I. 90](#); 8/21/25]

Related Pleadings:

- a) Certification of Counsel [[D.I. 114](#); 9/2/25]
- b) **Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief [[D.I. 132](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- c) Informal Response from the Official Committee of Unsecured Creditors

Status: **An order has been entered by the Court. No hearing is necessary.**

17. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Retain and Compensate Professionals in the Ordinary Course of Business Effective as of the Petition Date, (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief [[D.I. 91](#); 8/21/25]

Related Pleadings:

- a) Certification of Counsel [[D.I. 115](#); 9/2/25]
- b) **Order (I) Authorizing the Debtors to Retain and Compensate Professionals in the Ordinary Course of Business Effective as of the Petition Date, (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief [[D.I. 133](#); 9/2/25]**

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- c) Informal Response from the Office of the United States Trustee

Status: **An order has been entered by the Court. No hearing is necessary.**

[Signature page follows]

Dated: September 2, 2025
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ S. Alexander Faris

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