

**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)

**Re: Docket No. 149**

**DECLARATION OF BRANDON BATZEL IN SUPPORT OF OMNIBUS OBJECTION  
OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE  
DEBTORS' (I) DIP MOTION AND (II) SALE MOTION**

**-AND-**

**CROSS-MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR AN ORDER APPOINTING A CHAPTER 11 TRUSTEE**

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<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.



I, Brandon Batzel, hereby declare as follows:

I am a senior associate at the law firm Orrick, Herrington & Sutcliffe LLP (“Orrick” or the “Firm”), 51 West 52nd Street, New York, New York, 10019-6142, and have been duly admitted to practice in the State of New York.

I submit this declaration in support of the *Committee’s Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors’ (i) DIP Motion and (ii) Sale Motion and Cross-Motion of the Official Committee of Unsecured Creditors for an Order (A) Appointing a Chapter 11 Trustee* (the “Objection and Cross-Motion”) [Docket No. 149], filed contemporaneously herewith. Except as otherwise noted, I have personal knowledge of the matters set forth herein.

Attached hereto as Exhibit 1 is a true and correct copy of the final transcript from the Debtors’ Rule 30(b)(6) deposition taken on September 5, 2025, filed under seal.

Attached hereto as Exhibit 2 is a true and correct copy of all the exhibits introduced at the Debtors’ Rule 30(b)(6) deposition taken on September 5, 2025, filed under seal.

Attached hereto as Exhibit 3 is a true and correct copy of the Amended and Restated Guaranty of Recourse Carve-Out Obligations, dated July 1, 2024, filed under seal.

Attached hereto as Exhibit 4 is a true and correct copy of a presentation for potential investors prepared by Portage Point Partners, dated August 2025, filed under seal.

Attached hereto as Exhibit 5 is a true and correct copy of a supplemental presentation for potential investors prepared by Portage Point Partners, dated September 2025, filed under seal.

Attached hereto as Exhibit 6 is a true and correct copy of a presentation for potential investors prepared by Houlihan Lokey Capital, Inc, dated October 2023, filed under seal.

Attached hereto as Exhibit 7 is a true and correct copy of a Quality of Earnings report prepared by Grant Thornton, dated January 2024, filed under seal.

Attached hereto as Exhibit 8 is a true and correct copy of an Avant Gardner Management Presentation, dated February 2025, filed under seal.

Attached hereto as Exhibit 9 is a true and correct copy of a Governance Side Letter prepared by AGDP Holding Inc., dated July 1, 2024, filed under seal.

Attached hereto as Exhibit 10 is a true and correct copy of a spreadsheet provided by counsel to Axar showing its loan balances over time, filed under seal.

Attached hereto as Exhibit 11 is a true and correct copy of the Amended and Restated Warrant to Purchase Common Stock of AGDP Holding, Inc., dated May 3, 2024, filed under seal.

Attached hereto as Exhibit 12 is a true and correct copy of a Settlement Agreement between NYC Festivals, LLC, NYC Club Event, LLC, SFXE IP LLC, and LiveStyle Holdings, Inc., and Avant Gardner, LLC, Reynard Productions LLC, and AGDP Holding Inc., dated November 16, 2023, filed under seal.

Attached hereto as Exhibit 13 is a true and correct copy of an Avant Gardner Management Update Presentation, dated October 21, 2024, filed under seal.

Attached hereto as Exhibit 14 is a true and correct copy of an email thread with Michael Marini and Cosmo Giancaspro dated January 13, 2025, filed under seal.

Attached hereto as Exhibit 15 is a true and correct copy of an email from Josh Wyatt, dated May 6, 2025.

Attached hereto as Exhibit 16 is a true and correct copy of an email from Alec Ifshin, dated May 28, 2025, filed under seal.

Attached hereto as Exhibit 17 is a true and correct copy of an email from Alec Ifshin, dated June 9, 2025, filed under seal.

Attached hereto as Exhibit 18 is a true and correct copy of an email thread with Hooman Yazhari, Lilly Donohue, Andrew Axelrod, and Gary Richards, dated May 2025, filed under seal.

Attached hereto as Exhibit 19 is a true and correct copy of an email thread with Lilly Donohue, Andrew Axelrod, and Gary Richards, dated June 2025, filed under seal.

Attached hereto as Exhibit 20 is a true and correct copy of an AGDP Holding Inc. consolidated balance sheet, dated December 31, 2023, filed under seal.

*[Remainder of Page Intentionally Left Blank]*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ *Brandon Batzel*

Brandon Batzel

Executed on September 7, 2025, in New York, New York

**EXHIBIT 1**

**[FILED UNDER SEAL]**

**EXHIBIT 2**

**[FILED UNDER SEAL]**

**EXHIBIT 3**

**[FILED UNDER SEAL]**



**EXHIBIT 4**

**[FILED UNDER SEAL]**

**EXHIBIT 5**

**[FILED UNDER SEAL]**

**EXHIBIT 6**

**[FILED UNDER SEAL]**

**EXHIBIT 7**

**[FILED UNDER SEAL]**

**EXHIBIT 8**

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**EXHIBIT 12**

**[FILED UNDER SEAL]**

**EXHIBIT 13**

**[FILED UNDER SEAL]**

**EXHIBIT 14**

**[FILED UNDER SEAL]**

**EXHIBIT 15**

**From:** Josh Wyatt <[josh@avant-gardner.com](mailto:josh@avant-gardner.com)>

**Date:** May 6, 2025 at 8:00:43 AM GMT+8

**To:** Justin Smith <[justin@heini.build](mailto:justin@heini.build)>, Alec Ifshin <[alec@avant-gardner.com](mailto:alec@avant-gardner.com)>, Christopher Cox <[ccox@styshospitality.com](mailto:ccox@styshospitality.com)>, Nicole Hurstell <[nicole@heini.build](mailto:nicole@heini.build)>, Pascal Derron <[pascal@avant-gardner.com](mailto:pascal@avant-gardner.com)>

**Subject: Wed Payment**

Justin/Nicole,

Our investors are aware of the wed \$800k payment. To ensure we successfully receive permission to send this, we are going to have to ensure we have our paperwork correct and invoices correct. They are very deep into our business now and running finance from above including personally now approving all wires. As such we need to give them the background and a proper invoice for the monies owed with some explanations similar to how you did it a few weeks back, and an overall balance forward that is coming due so we can manage through this. Its a bit of work but something we can all accomplish by Wed morning I am sure so that you get paid ontime.

Let us know tomorrow?

Josh

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Josh Wyatt  
CEO

[AVANT GARDNER](#)

The Brooklyn Mirage | Great Hall | Kings Hall  
c: 917.836.9401

**EXHIBIT 16**

**[FILED UNDER SEAL]**

**EXHIBIT 17**

**[FILED UNDER SEAL]**

**EXHIBIT 18**

**[FILED UNDER SEAL]**



**EXHIBIT 19**

**[FILED UNDER SEAL]**

**EXHIBIT 20**

**[FILED UNDER SEAL]**