

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 Nos. 155 & 156

**CERTIFICATION OF COUNSEL SUBMITTING ORDER DENYING IN PART AND
GRANTING IN PART BASED ON PARTY CONSENT THE MOTION OF OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER (A) ADJOURNING
THE HEARING ON THE DEBTORS' (I) DIP MOTION AND (II) SALE MOTION OR,
ALTERNATIVELY, (B) SHORTENING THE NOTICE AND OBJECTION PERIODS
FOR, AND SCHEDULING AN EXPEDITED HEARING ON THE CROSS-MOTION OF
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER
APPOINTING A CHAPTER 11 TRUSTEE**

On September 8, 2025, the Official Committee of Unsecured Creditors (the “Committee”) in the chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of the Official Committee of Unsecured Creditors for an Order (A) Adjourning the Hearing on the Debtors’ (the “Motion to Adjourn”) (I) DIP Motion (the “Final DIP Motion”) and (II) Sale Motion (the “Bid Procedures Motion”) or, Alternatively, (B) Shortening the Notice And Objection Periods for, and Scheduling an Expedited Hearing on, the Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing A Chapter 11 Trustee (the “Motion to Shorten”) [D.I. 155] of the Official Committee of Unsecured Creditors (the “Committee”) and the *Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee* [Docket No. 149] (the “Motion to Shorten” and together*

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.



with the Motion, the “Committee’s Motions”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

On September 8, 2025, the Court held a status conference (the “Status Conference”) with respect to the Committee’s Motion. At the Status Conference, the Court ruled that it would (i) deny the Motion to Adjourn as to the Bid Procedures Motion, (ii) grant based on party consent the Motion to Adjourn as to the Final DIP Motion, and (iii) deny the Motion to Shorten with respect to the Cross-Motion. The Debtors, in consultation with the Committee, have prepared a proposed form of order (the “Proposed Order”) memorializing the rulings made by the Court on the record at the Status Conference. The Proposed Order is attached hereto as **Exhibit A**.

The Debtors have shared the Proposed Order with counsel for the Committee and counsel for the DIP Lender who have advised that they consent to entry of the Proposed Order.

WHEREFORE, the Debtors respectfully request that the Court enter the Order without further notice or a hearing at the Court’s earliest convenience.

[Signature page follows]

Dated: September 10, 2025
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,
LLP**

/s/ S. Alexander Faris

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Exhibit A

Proposed Order

**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 Nos. 149, 155 & 158

**ORDER DENYING IN PART AND GRANTING IN PART BASED ON PARTY
CONSENT THE MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR AN ORDER (A) ADJOURNING THE HEARING ON THE
DEBTORS' (I) DIP MOTION AND (II) SALE MOTION OR, ALTERNATIVELY,
(B) SHORTENING THE NOTICE AND OBJECTION PERIODS FOR, AND
SCHEDULING AN EXPEDITED HEARING ON THE CROSS-MOTION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER
APPOINTING A CHAPTER 11 TRUSTEE**

Upon consideration of the *Motion of the Official Committee of Unsecured Creditors for an Order (A) Adjourning the Hearing on the Debtors'* (the "Motion to Adjourn") (I) *DIP Motion* (the "Final DIP Motion") and (II) *Sale Motion* (the "Bid Procedures Motion") or, Alternatively, (B) *Shortening the Notice And Objection Periods for, and Scheduling an Expedited Hearing on, the Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing A Chapter 11 Trustee* (the "Motion to Shorten") [D.I. 155]² of the Official Committee of Unsecured Creditors (the "Committee") and the *Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee* [Docket No. 149] (the "Cross-Motion"),

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

and the response [D.I. 158] (the “Response”) by the above-captioned debtors and debtors in possession (collectively, the “Debtors”), it is HEREBY ORDERED THAT:

1. The Motion to Adjourn the Bid Procedures Motion is DENIED and the hearing on the Bid Procedures Motion shall be September 11, 2025 at 2:00 p.m.

2. The Motion to Shorten with respect to the Cross-Motion is DENIED and the hearing on the Cross-Motion shall be held on October 3, 2025 at 10:30 a.m. (ET).

3. The consensual Motion to Adjourn with respect to the Final DIP Motion is GRANTED and the hearing on the Final DIP Motion shall be held on October 3, 2025 at 10:30 a.m. (ET).