

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)

**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON SEPTEMBER 11, 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/RESOLVED 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]

<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.

<sup>2</sup> 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) 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]
- g) Notice of Filing of Proposed Final DIP Order [[D.I. 147](#); 9/5/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET), as extended to September 7, 2025 for the Official Committee of Unsecured Creditors

Objections/Informal Responses:

- h) 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 [(SEALED) D.I. 149; 9/7/25, and (Redacted) [D.I. 150](#); 9/7/25]
- i) Declaration of Joshua Nahas 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 [(SEALED) D.I. 151; 9/7/25, and (Redacted) D.I. TBD]

- j) Declaration of Joshua Nahas 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 [(SEALED) D.I. 152; 9/7/25, and (Redacted) [D.I. 153](#); 9/7/25]

**Additional Pleadings:**

- k) **Certification of Counsel Submitting Third 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. 170](#); 9/10/25]**
- l) **Third 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. 176](#); 9/11/25]**

Status: **With consent of the DIP Lender and the Committee, the Debtors have filed a third interim order approving this matter, which order has been approved by the Court. This matter is adjourned to October 3, 2025 at 10:30 a.m. (ET).**

2. Motion of the Official Committee of Unsecured Creditors to Shorten Notice Period With Respect to the Motion of the 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 [[D.I. 156](#); 9/8/25]

**Related Pleadings:**

- a) Debtors' Response to Motion of the 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 [[D.I. 158](#); 9/8/25]

- b) **Certification of Counsel Submitting Order Denying in Part and Granting in Part Based on Party Consent the Motion of the 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 [D.I. 171; 9/10/25]**
- c) **Order Denying in Part and Granting in Part Based on Party Consent the Motion of the 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 [D.I. 177; 9/11/25]**

Status: As stated on the record at the status conference held on September 8, 2025, the motion to shorten was denied as to the Committee's cross-motion for the appointment of a chapter 11 trustee and the motion to adjourn the bid procedures motion. **An order memorializing such has been entered by the Court.**

### **MATTERS GOING FORWARD**

- 3. 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]
- c) Notice of Filing of Revised Proposed Bidding Procedures Order [[D.I. 148](#); 9/5/25]
- d) Motion of the Official Committee of Unsecured Creditors to Shorten Notice Period with Respect to the Motion of the 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 [D.I. 156; 9/8/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET), as extended to September 7, 2025 for the Official Committee of Unsecured Creditors

Objections/Informal Responses:

- e) 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 [(SEALED) D.I. 149; 9/7/25, and (Redacted) [D.I. 150](#); 9/7/25]
- f) Declaration of Joshua Nahas 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 [(SEALED) D.I. 151; 9/7/25]
- g) 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 [(SEALED) D.I. 152; 9/7/25, and (Redacted) [D.I. 153](#); 9/7/25]

**Additional Pleadings:**

- h) Certification of Counsel Regarding 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 [[D.I. 166](#); 9/10/25]**
- i) Order (I) Approving Certain Bidding Procedures and the Form and Manner of Notice Thereof, (II) Authorizing the Debtors to Designate the Stalking Horse Bidder, (III) Scheduling an Auction and a Hearing on the Approval of the Sale of Some, All, or Substantially All of the Debtors' Assets, (IV) Authorizing the Debtors to Enter Into the Purchase Agreement(s), (V) Establishing Certain Assumption and Assignment Procedures and Approving the Manner of Notice Thereof, and (VI) Granting Related Relief [[D.I. 173](#); 9/11/25]**

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

- 4. Motion of the Official Committee of Unsecured Creditors for an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (A) the Official Committee of Unsecured Creditors' Omnibus Objection to the Debtors' DIP Motion and Sale Motion and Cross-Motion for an Order Appointing a Chapter 11 Trustee, (B) Its Declarations in Support Thereof, and (C) Exhibits to Its Exhibit and Witness Lists for Any Hearing on the DIP Motion, Sale Motion, and Cross-Motion [[D.I. 154](#); 9/7/25]

**Related Pleadings:**

- a) 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 [(SEALED) D.I. 149; 9/7/25, and (Redacted) [D.I. 150](#); 9/7/25]
- b) Declaration of Joshua Nahas 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 [(SEALED) D.I. 151; 9/7/25]

- a) Declaration of Joshua Nahas 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 [(SEALED) D.I. 152; 9/7/25, and (Redacted) [D.I. 153](#); 9/7/25]

Objection Deadline: At the hearing.

Objections/Informal Responses: None to date.

Status: **By agreement of the parties, this matter is adjourned to the hearing on October 3, 2025 at 10:30 a.m. (ET).**

Dated: September 11, 2025  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

*/s/ S. Alexander Faris*

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