

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)

AGDP HOLDING INC., *et al.*,

Plaintiff,

v.

TVT Capital Source LLC, White Star Funding
Inc. d/b/a TVT Cap, Insta Funding LLC, and
Pinnacle Business Funding LLC,

Defendants.

Adv. Proc. No. 25-51803 (MFW)

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING
STIPULATION EXTENDING DEADLINE FOR DEFENDANTS TVT CAPITAL
SOURCE LLC, INSTA FUNDING LLC, AND PINNACLE BUSINESS FUNDING LLC
TO RESPOND TO THE AMENDED COMPLAINT**

The undersigned counsel hereby certifies as follows:

AGDP Holding Inc. (the “Plaintiff”) and TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC (the “Defendants”) have agreed, subject to this Court’s approval, to extend the Defendants’ time to answer, move, or otherwise respond to the Plaintiff’s amended complaint against the Defendants. Attached hereto as **Exhibit 1** is a proposed form of

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.



order (the “Proposed Order”) approving the stipulation. The stipulation is attached as **Exhibit A** to the proposed form of order.

WHEREFORE, the Plaintiff and the Defendants request that this Court enter the Proposed Order at the Court’s earliest convenience.

Dated: September 22, 2025
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,
LLP**

/s/ Renae P. Pagano

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Counsel to the Debtors and Debtors in Possession

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
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**ORDER APPROVING STIPULATION EXTENDING DEADLINE
FOR DEFENDANTS TVT CAPITAL SOURCE LLC, INSTA FUNDING LLC,
AND PINNACLE BUSINESS FUNDING LLC
TO RESPOND TO THE AMENDED COMPLAINT**

Upon consideration of the *Stipulation Extending Deadline for Defendants TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Respond to the Amended Complaint*, a copy of which is attached hereto as **Exhibit A** (the “Stipulation”), and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Stipulation and the terms set forth therein are APPROVED and shall have the full force and effect of an order entered by the Court with respect thereto;

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2. The time within which the Defendants shall answer, move, or otherwise respond to the amended complaint is extended to October 13, 2025;

3. Entry of this Order and approval of the Stipulation is without prejudice to the Defendants seeking another extension of time to respond to the amended complaint; and

4. This Court retains jurisdiction to interpret, implement and enforce the provisions of this Order and the Stipulation.

EXHIBIT A

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

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**STIPULATION EXTENDING DEADLINE FOR DEFENDANTS TVT CAPITAL
SOURCE LLC, INSTA FUNDING LLC, AND PINNACLE BUSINESS FUNDING LLC
TO RESPOND TO THE AMENDED COMPLAINT**

WHEREAS, on August 22, 2025, AGDP Holding Inc., et al. (the “Plaintiff”) filed the *Amended Complaint* (the “Amended Complaint”) in the above-captioned adversary proceeding against TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC (the “Defendants,” and together with the Plaintiff, the “Parties”);

WHEREAS, the Defendants agreed to accept service of the Amended Complaint;

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WHEREAS, the Defendants agree that the Summons and Complaint in this Adversary Proceeding were properly served on the Defendants, and the Defendants agree not to raise an affirmative defense to, or otherwise challenge, the sufficiency of service of process;

WHEREAS, the Defendants agree that the Summons and Complaint in this Adversary Proceeding contain the proper names of the Defendants and that the Plaintiff has commenced this Adversary Proceeding against the properly named Defendants, or, alternatively, the Defendants agree not to raise an affirmative defense, or otherwise claim, that Plaintiff failed to properly name the Defendants; and

WHEREAS, the Plaintiff agrees to extend the Defendants' deadline to answer, move, or otherwise respond to the Amended Complaint until October 13, 2025 (the "Answer Deadline").

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

1. The Summons and Complaint were properly served on the Defendants, and the Defendants agree not to raise an affirmative defense to, or otherwise challenge, the sufficiency of service of process.
2. The Summons and Complaint contain the proper names of the Defendants and Plaintiff has commenced this Adversary Proceeding against the properly named Defendants, or, alternatively, the Defendants agree not to raise an affirmative defense, or otherwise claim, that Plaintiff failed to properly name the Defendants.
3. The Answer Deadline is hereby extended through and including October 13, 2025, without prejudice to the Defendants to seek further extension of the Answer Deadline.

STIPULATED AND AGREED TO THIS 22ND DAY OF SEPTEMBER, 2025:

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Renae P. Pagano

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Sean M. Beach (No. 4070)

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Attorneys for Plaintiff