

**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 APPEARANCE AND REQUEST FOR NOTICES**

PLEASE TAKE NOTICE, that the undersigned counsel hereby enters their appearance for Gardner Purchaser, LLC and Stewart Purchaser, LLC (together, the “Brooklyn Mirage Landlord”), pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and requests that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon the Brooklyn Mirage Landlord through its undersigned counsel, as follows:

Laurel D. Roglen  
**BALLARD SPAHR LLP**  
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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.



PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural rights of the Brooklyn Mirage Landlord including, without limitation, (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Brooklyn Mirage Landlord is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Brooklyn Mirage Landlord expressly states otherwise, the Brooklyn Mirage Landlord does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent

of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: September 30, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ Laurel D. Roglen

Laurel D. Roglen (DE No. 5759)

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-and-

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*Attorneys for Gardner Purchaser, LLC and  
Stewart Purchaser, LLC*

**CERTIFICATE OF SERVICE**

I, Laurel D. Roglen, hereby certify that, on this 30th day of September 2025, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* to be served via CM/ECF on all parties who have registered for electronic service in these cases.

Dated: September 30, 2025  
Wilmington, Delaware

/s/ Laurel D. Roglen

Laurel D. Roglen (DE No. 5759)  
BALLARD SPAHR LLP