

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)

Re: Docket No. 154

**CERTIFICATE OF NO OBJECTION REGARDING
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**

The undersigned counsel hereby certifies as follows:

On September 7, 2025, the Official Committee of Unsecured Creditors (the "Committee") appointed in the chapter 11 bankruptcy cases of the above-captioned cases debtors and debtors-in-possession, by and through undersigned proposed counsel, filed the *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* [Docket No.

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.



154] (the “Motion to Seal”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

The deadline to object to the Motion was September 23, 2025, at 4:00 p.m. (ET).

The undersigned further certifies that after reviewing the Court’s docket in this case, no formal answer, objection, or other responsive pleading to the Motion appears thereon. The Committee respectfully requests that the Court enter the proposed order granting the Motion, a copy of which is attached hereto and to the Motion as **Exhibit A**.

Dated: September 30, 2025

MORRIS JAMES LLP

/s/ Siena B. Cerra

Eric J. Monzo (DE Bar No. 5214)
Siena B. Cerra (DE Bar No. 7290)
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Telephone: (302) 888-6800
E-mail: emonzo@morrisjames.com
scerra@morrisjames.com

-and-

ORRICK, HERRINGTON & SUTCLIFFE LLP

Nicholas Poli (admitted *pro hac vice*)
Mark Franke (admitted *pro hac vice*)
Brandon Batzel (admitted *pro hac vice*)
Ari Roytenberg (admitted *pro hac vice*)
51 West 52nd Street
New York, NY 10019-6142
Telephone: (212) 506-5000
E-mail: npoli@orrick.com
mfranke@orrick.com
bbatzel@orrick.com
aroytenberg@orrick.com

-and-

Nick Sabatino (admitted *pro hac vice*)
400 Capitol Mall, Suite 3000
Sacramento, CA 95814
Telephone: (916) 447-9200
E-mail: nsabatino@orrick.com

*Proposed Counsel to the Official Committee of
Unsecured Creditors*

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)

Re: Docket No. 154

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

Upon the motion (the "Motion")² of the Committee for entry of an order pursuant to sections 105 and 107 of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1 authorizing the Committee to file under seal certain Confidential Information in connection with the Objection and Cross-Motion and the other Proposed Sealed Documents, the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b); (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Motion is in the best interest of all parties; (iv) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary; and (v) upon the record herein after due deliberation thereon, good and sufficient cause exists for the granting of the relief as set forth herein. Therefore,

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.

² Capitalized terms not otherwise defined herein shall have the meaning given to them in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Committee is authorized to file an un-redacted version of the Objection and Cross-Motion, the Nahas Declaration, the Batzel Declaration, any Supplemental Declaration, and any Exhibit and Witness List under seal.
3. The Committee is permitted to file a redacted version of the Objection and Cross-Motion, the Batzel Declaration, and any Exhibit and Witness List.
4. The un-redacted version of the Objection and Cross-Motion, the Nahas Declaration, the Batzel Declaration, any Supplemental Declaration, or any Exhibit and Witness List may not be unsealed unless and until permitted by further order of this Court.
5. The Committee is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.
6. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.