

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)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 3, 2025 AT 10:30 A.M. (ET)**

****AS NO MATTERS ARE GOING FORWARD, THIS HEARING
HAS BEEN CANCELLED AT THE DIRECTION OF THE COURT****

ADJOURNED 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]
- 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

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.



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) D.I. 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]
- h) 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]
- i) Notice of Filing of Global Settlement Term Sheet [[D.I. 206](#); 9/18/25]
- j) Certification of Counsel Submitting Fourth 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. 252](#); 10/1/25]

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:

- k) 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]
- l) 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]
- m) 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]

Status: This matter has been resolved in principle. In order to allow the parties time to finalize and document the settlement agreement, this matter is adjourned to October 22, 2025 at 10:30 a.m. (ET).

2. 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]

Related Pleadings:

- 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. 151; 9/7/25, and (Redacted) D.I. TBD]
- b) 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]

- c) 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 [[D.I. 177](#); 9/11/25]
- d) Notice of Hearing on Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [[D.I. 179](#); 9/11/25]
- e) Notice of Filing of Global Settlement Term Sheet [[D.I. 206](#); 9/18/25]

Objection Deadline: September 23, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

Status: This matter has been resolved in principle. In order to allow the parties time to finalize and document the settlement agreement, this matter is adjourned to October 22, 2025 at 10:30 a.m. (ET).

UNCONTESTED MATTER WITH CERTIFICATE OF NO OBJECTION

- 3. 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, and (Redacted) D.I. TBD]
- c) 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]

- d) Amended Notice of 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. 180](#); 9/11/25]
- e) Certificate of No Objection [[D.I. 234](#); 9/30/25]

Objection Deadline: September 23, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

Status: A certificate of no objection has been filed. A hearing is only necessary to the extent the Court has questions or concerns.

Dated: October 1, 2025
Wilmington, Delaware

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