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

In re: Chapter 11

AGDP HOLDING INC., et al., 1 Case No. 25-11446 (MFW)

> (Jointly Administered) Debtors.

AGDP HOLDING INC., et al.,

Plaintiff,

v.

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

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

Defendants.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC in the abovecaptioned adversary proceeding. Pursuant to 11 U.S.C. § 1109(b), and Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned requests that all notices given or required to be given in the above-captioned adversary proceeding, be given to and served upon the following:

> Cheryl A. Santaniello, Esq. (DE Bar No. 5062) Porzio, Bromberg & Newman, P.C. 300 Delaware Avenue, Suite 1220 Wilmington, DE 19801 Telephone: (302) 526-1235 Facsimile: (302) 416-6064

<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.



Email: casantaniello@pbnlaw.com

-and-

Rachel A. Parisi, Esq.
Christopher P. Mazza, Esq.
Michael F. Medved, Esq.
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
P.O. Box 1997
Morristown, NJ 07962
Telephone: (973) 538-4006

Facsimile: (973) 538-5146
Email: <a href="mailto:raparisi@pbnlaw.com">raparisi@pbnlaw.com</a>
Email: <a href="mailto:raparisi@pbnlaw.com">raparisi@pbnlaw.com</a>
Email: <a href="mailto:mfmedved@pbnlaw.com">mfmedved@pbnlaw.com</a>

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of an application, motion, petition, pleading, request, complaint, or demand, statements of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC's: (i) right to have final orders in non-core and core matters in which the Bankruptcy Court does not have final adjudicatory authority entered only after *de novo* review by a District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses,

setoffs or recoupments to which TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC are or may be entitled to under agreements, in law, or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: October 10, 2025

/s/ Cheryl A. Santaniello

Cheryl A. Santaniello, Esq. (DE Bar No.

5062)

Porzio, Bromberg & Newman, P.C.

300 Delaware Avenue, Suite 1220

Wilmington, DE 19801 Telephone: (302) 526-1235 Facsimile: (302) 416-6064

E-mail: <a href="mailto:casantaniello@pbnlaw.com">casantaniello@pbnlaw.com</a>

-and-

Rachel A. Parisi, Esq. (pro hac vice pending) Christopher P. Mazza, Esq. (pro hac vice pending)

Michael F. Medved, Esq. (pro hac vice pending)

Porzio, Bromberg & Newman, P.C.

100 Southgate Parkway

P.O. Box. 1997

Morristown, New Jersey 07962 Telephone: (973) 538-4006 Facsimile: (973) 538-5146

Email: <a href="mailto:raparisi@pbnlaw.com">raparisi@pbnlaw.com</a>
Email: <a href="mailto:raparisi">raparisi@pbnlaw.com</a>
Email: <a href="mailto:raparisi">raparisi@pbnlaw.com</a>