

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

-----X

In re:

Chapter 11

AGDP HOLDING INC., *et al.*,

Case No. 25-11446 (MFW)  
(Jointly Administered)

Debtors.

-----X

AGDP HOLDING INC., *et al.*,

Plaintiff,

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

v.

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

Defendants.

-----X

**WHITE STAR FUNDING INC.'S  
MOTION TO DISMISS THE FIRST AMENDED COMPLAINT**

White Star Funding Inc. d/b/a TVT Cap’s (“TVT Cap”) moves to dismiss the First Amended Complaint filed in Adv. Pro. No. 25-51803 on August 22, 2025 (“FAC”) by plaintiffs Avant Gardner, LLC, AGDP Holdings Inc., EZ Festivals, LLC, Made Event, L.L.C., and Reynard Productions LLC (collectively, “Plaintiff” or “Debtors”) pursuant to Federal Rule of Civil Procedure 12(b)(6) made applicable pursuant to Federal Rule of Bankruptcy Procedure 7012.

Pursuant to Federal Rule of Bankruptcy Procedure 7012, TVT Cap does not consent to entry of final orders or judgments by the Bankruptcy Court in these adversary proceedings to the extent they are determined to be non-core proceedings.



WHEREFORE, for the reasons set forth in the accompanying memorandum of law, TVT Cap respectfully requests that this Court issue an order, in the form attached hereto as **Exhibit A**, granting the motion to dismiss and granting, dismissing the FAC with prejudice, and granting such further relief as this Court may deem just and proper.

Dated: October 13, 2025

Respectfully submitted,

/s/ Gregory W. Hauswirth

Gregory W. Hauswirth (Bar No. 5679)  
CAROTHERS & HAUSWIRTH LLP  
1007 N. Orange Street, 4<sup>th</sup> Floor  
Wilmington, DE 19801  
Telephone: (302) 332-7181  
Facsimile: 412-910-7510  
Email: [ghauswirth@ch-legal.com](mailto:ghauswirth@ch-legal.com)

-and-

Steven B. Eichel (pro hac vice pending)  
LEECH TISHMAN  
ROBINSON BROG, PLLC  
One Dag Hammarskjöld Plaza  
885 Second Avenue, 3<sup>rd</sup> Floor  
New York, NY 10022  
Telephone: (212) 603-6300  
Email: [seichel@leechtishman.com](mailto:seichel@leechtishman.com)

*Counsel for White Star Funding, Inc.*

**EXHIBIT A**

**PROPOSED ORDER**

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

-----X

In re:

Chapter 11

AGDP HOLDING INC., *et al.*,

Case No. 25-11446 (MFW)  
(Jointly Administered)

Debtors.

-----X

AGDP HOLDING INC., *et al.*,

Plaintiff,

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

v.

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

Defendants.

-----X

**ORDER GRANTING MOTION TO DISMISS**

Upon Consideration of White Star Funding Inc. d/b/a TVT Cap’s (“TVT” Cap”) Motion to Dismiss (the “Motion”), and the Court having reviewed the Motion and the related memorandum of law; and the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) and the legal and factual bases set forth in the Motion and related memorandum of law establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is Granted.
2. The First Amended Complaint filed in Adv. Pro. No. 25-51803 on August 22, 2025 (“FAC”) by plaintiffs Avant Gardner, LLC, AGDP Holdings Inc., EZ Festivals, LLC, Made Event, L.L.C., and Reynard Productions LLC is dismissed with prejudice with respect to TVT Cap.
3. The Court retains exclusive jurisdiction with respect to all matters arising from

or related to the implementation of this Order.