

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)

AGDP HOLDING INC., *et al.*,

Plaintiff,

v.

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

Defendants.

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

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING  
STIPULATION EXTENDING DEADLINE FOR PLAINTIFF  
TO RESPOND TO DEFENDANT’S MOTION TO DISMISS**

The undersigned counsel hereby certifies as follows:

AGDP Holding Inc., *et al.* (the “Plaintiff”) and White Star Funding Inc. d/b/a TVT Cap (the “Defendant”) have agreed, subject to this Court’s approval, to extend the Plaintiff’s time to respond to the Defendant’s motion to dismiss against the Plaintiff and extend the Defendant’s time to reply to the Plaintiff’s response. Attached hereto as **Exhibit 1** is a proposed form of order (the

<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.



“Proposed Order”) approving the stipulation. The stipulation is attached as **Exhibit A** to the proposed form of order.

WHEREFORE, the Plaintiff and the Defendant request that this Court enter the Proposed Order at the Court’s earliest convenience.

Dated: October 21, 2025  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,  
LLP**

*/s/ Renae P. Pagano*

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**EXHIBIT 1**

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

In re:

AGDP HOLDING INC., *et al.*,<sup>1</sup>

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AGDP HOLDING INC., *et al.*,

Plaintiff,

v.

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

Defendants.

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

**ORDER APPROVING STIPULATION EXTENDING DEADLINE  
FOR PLAINTIFF TO RESPOND TO DEFENDANT’S MOTION TO DISMISS**

Upon consideration of the *Stipulation Extending Deadline for Plaintiff to Respond to Defendant’s Motion to Dismiss*, a copy of which is attached hereto as **Exhibit A** (the “Stipulation”), and after due deliberation and sufficient cause appearing therefore,

**IT IS HEREBY ORDERED THAT:**

1. The Stipulation and the terms set forth therein are APPROVED and shall have the full force and effect of an order entered by the Court with respect thereto;
2. The time within which the Plaintiff shall respond to the Defendant’s motion to dismiss is extended through and including November 17, 2025;

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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.

3. The time within which the Defendant shall reply to the Plaintiff's response is extended through and including December 5, 2025;

4. Entry of this Order and approval of the Stipulation is without prejudice to the parties seeking additional extensions of time related to the Defendant's motion to dismiss; and

5. This Court retains jurisdiction to interpret, implement and enforce the provisions of this Order and the Stipulation.

**EXHIBIT A**

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

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Plaintiff,

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

Defendants.

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

**STIPULATION EXTENDING DEADLINE FOR  
PLAINTIFF TO RESPOND TO DEFENDANT’S MOTION TO DISMISS**

WHEREAS, on August 22, 2025, AGDP Holding Inc., *et al.* (the “Plaintiff”) filed the *Amended Complaint* (the “Amended Complaint”) in the above-captioned adversary proceeding against White Star Funding Inc. d/b/a TVT Cap (the “Defendant,” and together with the Plaintiff, the “Parties”);

WHEREAS, on September 23, 2025, the Court entered the *Order Approving Stipulation Extending Deadline for Defendant White Star Funding Inc. d/b/a TVT Cap to Respond to the*

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*Amended Complaint* [D.I. 14], extending the Defendant’s deadline to answer, move, or otherwise respond to the Amended Complaint until October 13, 2025.

WHEREAS, on October 13, 2025, the Defendant filed *White Star Funding Inc.’s Motion to Dismiss the First Amended Complaint* [D.I. 25] and *Defendant White Star Funding Inc.’s Memorandum of Law in Support of Motion to Dismiss Debtors’ First Amended Complaint* [D.I. 26] (together, the “Motion to Dismiss”).

WHEREAS, the Parties agree to extend the deadline for Plaintiff to respond to the Defendant’s Motion to Dismiss through and including November 17, 2025 (the “Response Deadline”).

WHEREAS, the Parties agree to extend the deadline for the Defendant to reply to the Plaintiff’s response through and including December 5, 2025 (the “Reply Deadline”).

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:**

1. The Response Deadline is hereby extended through and including November 17, 2025, without prejudice to the Plaintiff to seek further extension of the Response Deadline.
2. The Reply Deadline is hereby extended through and including December 5, 2025, without prejudice to the Defendant to seek further extension of the Reply Deadline.

*[Signature page follows]*



**STIPULATED AND AGREED TO THIS 21ST DAY OF OCTOBER, 2025:**

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

/s/ Renae P. Pagano

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