

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)

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 DEFENDANTS' COUNTERCLAIMS**

The undersigned counsel hereby certifies as follows:

AGDP Holding Inc., *et al.* (the “Plaintiff”) and TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC (the “Defendants”) have agreed, subject to this Court’s approval, to extend the Plaintiff’s time to answer, move, or otherwise respond to the Defendants’ counterclaims against the Plaintiff. Attached hereto as **Exhibit 1** is a proposed form of order (the

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.



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

WHEREFORE, the Plaintiff and the Defendants 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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Counsel to the Debtors and Debtors in Possession

EXHIBIT 1

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

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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 DEFENDANTS' COUNTERCLAIMS**

Upon consideration of the *Stipulation Extending Deadline for Plaintiff to Respond to Defendants' Counterclaims*, 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 answer, move, or otherwise respond to the Defendants' counterclaims is extended to November 24, 2025;

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3. Entry of this Order and approval of the Stipulation is without prejudice to the Plaintiff seeking another extension of time to respond to the Defendants' counterclaims; and

4. 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
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Debtors.

Chapter 11

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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)

**STIPULATION EXTENDING DEADLINE FOR
PLAINTIFF TO RESPOND TO DEFENDANTS' COUNTERCLAIMS**

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 TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC (the “Defendants,” and together with the Plaintiff, the “Parties”);

WHEREAS, on September 23, 2025, the Court entered the *Order Approving Stipulation Extending Deadline for Defendants TVT Capital Source LLC, Insta Funding LLC, and Pinnacle*

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Business Funding LLC to Respond to the Amended Complaint [D.I. 16], extending the Defendants' deadline to answer, move, or otherwise respond to the Amended Complaint until October 13, 2025.

WHEREAS, on October 13, 2025, the Defendants filed the *Answer, Affirmative Defenses, and Counterclaims of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC* [D.I. 24] (the "Counterclaims").

WHEREAS, the Parties agree to extend the deadline for Plaintiff to answer, move, or otherwise respond to the Defendants' Counterclaims until November 24, 2025 (the "Response Deadline").

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

1. The Response Deadline is hereby extended through and including November 24, 2025, without prejudice to the Plaintiff to seek further extension of the Response 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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