

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

In re: AGDP HOLDING INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 25-11446 (MFW) (Jointly Administered)
AGDP HOLDING INC., <i>et al.</i> , 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;

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.



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.

Dated: October 21st, 2025
Wilmington, Delaware

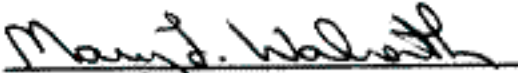

MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT A

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

In re: AGDP HOLDING INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 25-11446 (MFW) (Jointly Administered)
AGDP HOLDING INC., <i>et al.</i> , 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*

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.

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

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