

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

In re:

AGDP Holding, Inc. et al.,

Debtors.¹

Chapter 11

Case No. 25-11446-MFW

(Jointly Administered)

Related Docket No. 268

**JOINDER OF PUTATIVE CLASS PLAINTIFFS AND MOTION FOR AN ORDER
(I) AUTHORIZING PUTATIVE CLASS PLAINTIFFS TO FILE MOTIONS FOR CLASS
CERTIFICATION AND THE FULL BRIEFING THEREOF BY ALL PARTIES;
(II) AUTHORIZING THE ADJUDICATION OF MOTIONS FOR CLASS
CERTIFICATION; AND (III) ALLOWING THE CLASS ACTIONS
TO PROCEED AGAINST NON-DEBTOR PARTIES**

Plaintiffs Billy Ting, Duoc Vo, Garry Huang, Jeffrey Wang, Joshua Chin, and Willy Ngo (collectively, the “EZ Plaintiffs”), and Brett Carter, Christopher Adams, Daniel Ahn, Daniel Chiu, Jin Ang, Chan Jeon, John Sun, Joshua Friedman, Timmy Howard, and Weichieh Chi (collectively, the “Carter Plaintiffs,” and together with the EZ Plaintiffs, the “Joining Plaintiffs”), each by and through their undersigned counsel, hereby join (this “Joinder”) in the Motion of Putative Class Plaintiffs Nicole Brockmole, Lauren Bair, and Nick Ercklentz (the “Brockmole Plaintiffs”) for Limited Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 (Docket No. 268) (the “Motion”).

In support of this Joinder, the Joining Plaintiffs respectfully state as follows:

¹ The Debtors in these Chapter 11 cases, along with the four digits of each Debtor’s federal tax identification number, as applicable, are as follows: Avant Gardner LLC (6504), EZ Festivals LLC (8854), AGDP Holding Inc. (6404), AG Management Pool LLC (9962), Made Event LLC (6272), Reynard Productions LLC (3431).



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I. JOINDER AS TO THE EZ PLAINTIFFS

1. The EZ Plaintiffs are unsecured creditors and putative class plaintiffs in the consolidated class action pending before the United States District Court for the Southern District of New York, captioned *Avchukov, et al. v. Avant Gardner, LLC, et al.*, Case No. 1:23-cv-08106 (the “SDNY Action”).

2. The EZ Plaintiffs are represented by the undersigned counsel in the SDNY Action, which is the same consolidated proceeding in which the Brockmole Plaintiffs are parties.

3. The EZ Plaintiffs hereby join in and adopt in the entirety the arguments and relief requested in the Motion of the Brockmole Plaintiffs for limited relief from the automatic stay, including (a) authorization for the putative class plaintiffs to file and brief their motion for class certification in the SDNY Action; (b) authorization for the SDNY Court to adjudicate the motion for class certification; and (c) modification of the automatic stay to allow the litigation to proceed against all non-debtor parties.

4. The EZ Plaintiffs expressly incorporate by reference all factual and legal arguments, authorities, and requests for relief contained in the Motion as if fully set forth herein.

5. The EZ Plaintiffs respectfully request that the Motion be granted and that the separate proposed order, submitted herewith, be entered to ensure that the EZ Plaintiffs are provided the same relief as the Brockmole Plaintiffs.

II. JOINDER AND MOTION FOR RELIEF AS TO THE CARTER PLAINTIFFS (KINGS COUNTY ACTION)

6. The Carter Plaintiffs—Brett Carter, Christopher Adams, Daniel Ahn, Daniel Chiu, Jin Ang, Chan Jeon, John Sun, Joshua Friedman, Timmy Howard, and Weichieh Chi—are unsecured creditors and putative class plaintiffs in the case captioned *Brett Carter, et al. v. Alegria Productions Inc., Avant Gardner, LLC, AG Security Group Inc., and Stewart Purchaser LLC*,

Index No. 521124/2023 (N.Y. Sup. Ct., Kings Cnty.) (the “Kings County Action” and together with the SDNY Action, the “Class Actions”). The Kings County Action is a putative class action pending before the Supreme Court of the State of New York, County of Kings, arising from the Alegria Pride 2023 event hosted at Avant Gardner in Brooklyn, New York, on June 25, 2023. (Carter Third Am. Compl., Kings County Action, NYSCEF Doc. No. 80, ¶ 1.)

7. As alleged in the complaint, the Alegria Pride 2023 event, promoted by Alegria Productions and held at Avant Gardner, was advertised as the largest Pride celebration of the year and a safe and joyous space for the community. (*Id.* ¶¶ 1–3.) Instead, upon entry, attendees were subjected to invasive and nonconsensual searches by security guards hired and supervised by the defendants. (*Id.* ¶¶ 4–5.) Security guards allegedly forced attendees to remove clothing and expose intimate areas, engaged in discriminatory conduct targeting gay men, and continued harassing attendees inside the venue, including in restrooms. (*Id.* ¶¶ 4–5.) The event was then cut short nearly two hours before its scheduled end without delivering the promised performances. (*Id.* ¶ 6.)

8. The complaint further alleges that despite numerous written complaints from attendees, none of the defendants offered an apology or remedial measures. (*Id.* ¶ 7.) The Carter Plaintiffs bring this action on behalf of themselves and approximately 7,500 other individuals who attended Alegria Pride 2023, seeking class-wide relief. (*Id.* ¶¶ 85–86.)

9. As set forth in the complaint, the Carter Plaintiffs assert causes of action for (i) assault and battery; (ii) negligent hiring, training, and supervision; (iii) gross negligence; (iv) violation of the New York City Human Rights Law, Administrative Code § 8-107(4); (v) violation of the New York State Human Rights Law, Executive Law § 296; and (vi) violation of the New York General Business Law. (*Id.*, First – Sixth Causes of Action.) The complaint seeks

compensatory and punitive damages, declaratory relief certifying the class, and attorneys' fees and costs. (*Id.*, Prayer for Relief ¶¶ a–j.)

10. Among the defendants named in the Kings County Action, Avant Gardner, LLC is a debtor in these Chapter 11 proceedings. The remaining defendants—Alegria Productions Inc., AG Security Group Inc., and Stewart Purchaser LLC—are non-debtors. The automatic stay imposed pursuant to 11 U.S.C. § 362(a) has prevented the Carter Plaintiffs from filing and prosecuting their anticipated motion for class certification in the Kings County Action and from proceeding against the non-debtor defendants.

11. Like the Brockmole Plaintiffs and the EZ Plaintiffs, the Carter Plaintiffs are likely to succeed on the merits of their anticipated class certification motion because all the prerequisites for class certification under New York Civil Practice Law and Rules (CPLR) § 901(a) are present for the following reasons: (1) the numerosity element is satisfied because it would be impractical to join all members;² (2) common questions of law and fact predominate over those affecting individual members;³ (3) the claims are typical of the class as a whole;⁴ (4) the Carter Plaintiffs will fairly and adequately protect the interests of the putative class because (i) no conflicts exist among them with any other class members, (ii) they are willing and able to serve as class representatives, and understand their duties in that capacity, and (iii) counsel for the Carter Plaintiffs is willing, able, and qualified to act as class counsel;⁵ and (5) a class action is superior to other available methods for the fair and efficient adjudication of the controversy because the

² See *Consol. Rail Corp. v. Town of Hyde Park*, 47 F.3d 473, 483 (2d Cir. 1995) (numerosity presumed at 40 members).

³ See Mem. of St. Consumer Protection Bd. at 3, Bill Jacket, L. 1975, ch. 207.

⁴ See *Deluca v. Tonawanda Coke Corp.*, 134 A.D.3d 1534, 1536, 22 N.Y.S.3d 768, 770 (2015) (quoting *Borden v. 400 E. 55th St. Assocs., L.P.*, 24 N.Y.3d 382, 399, 23 N.E.3d 997, 1005 (2014)).

⁵ See *Ferrari v. Nat'l Football League*, 153 A.D.3d 1589, 1592, 61 N.Y.S.3d 421, 425 (2017).

range of damages would be too costly to litigate individually, thereby depriving class members of their day in court.⁶

12. Accordingly, the Carter Plaintiffs respectfully request that this Court grant limited relief from the automatic stay pursuant to 11 U.S.C. § 362(d), consistent with the relief sought in the Brockmole Motion, to permit the Supreme Court of the State of New York, County of Kings, to hear and adjudicate the anticipated motion for class certification in the Kings County Action and to allow the litigation to proceed against the non-debtor defendants.

13. The Joining Plaintiffs request that the Court enter a separate proposed order, submitted herewith, granting such limited relief as to both the Carter Plaintiffs and the EZ Plaintiffs in their respective Class Actions.

The Joining Plaintiffs reserve all rights to supplement this Joinder, file additional pleadings, or seek further relief as may be appropriate, and to be heard at any hearing on the Motion or related matters.

WHEREFORE, for the reasons set forth herein and in the Motion, the Joining Plaintiffs respectfully request that this Court: (i) grant the Motion to the extent set forth therein; (ii) enter the proposed order attached thereto; (iii) enter the separate proposed order attached hereto regarding the Kings County Action and the SDNY Action; and (iv) grant such other and further relief as this Court deems just and proper.

[Remainder left blank]

⁶ See *id.* at 1593.

Dated: November 10, 2025
Wilmington, Delaware

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

/s/ Matthew P. Ward

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-and-

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/s/ Jacob Chen

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Attorneys for Plaintiffs

Billy Ting, Duoc Vo, Garry Huang, Jeffrey Wang, Joshua Chin, and Willy Ngo, on behalf of themselves and all others similarly situated, and for Plaintiffs Brett Carter, Christopher Adams, Daniel Ahn, Daniel Chiu, Jin Ang, Chan Jeon, John Sun, Joshua Friedman, Timmy Howard, and Weichieh Chi, on behalf of themselves and all others similarly situated

**IN THE UNITED STATES BANKRUPTCY COURT
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In re:

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Debtors.¹

Chapter 11

Case No. 25-11446-MFW

(Jointly Administered)

**Objection Deadline: November 18, 2025 at 4:00 p.m.
Hearing Date: November 25, 2025 at 10:30 a.m. (ET)**

**NOTICE OF JOINDER AND MOTION OF CLASS ACTION PLAINTIFFS FOR AN
ORDER (I) AUTHORIZING PUTATIVE CLASS PLAINTIFFS TO FILE MOTIONS
FOR CLASS CERTIFICATION AND THE FULL BRIEFING THEREOF BY ALL
PARTIES; (II) AUTHORIZING THE ADJUDICATION OF MOTIONS FOR CLASS
CERTIFICATION; AND (III) ALLOWING THE CLASS ACTIONS
TO PROCEED AGAINST NON-DEBTOR PARTIES**

PLEASE TAKE NOTICE that Plaintiffs Billy Ting, Duoc Vo, Garry Huang, Jeffrey Wang, Joshua Chin, and Willy Ngo (collectively, the “EZ Plaintiffs”), and Brett Carter, Christopher Adams, Daniel Ahn, Daniel Chiu, Jin Ang, Chan Jeon, John Sun, Joshua Friedman, Timmy Howard, and Weichieh Chi (collectively, the “Carter Plaintiffs,” and together with the EZ Plaintiffs, the “Joining Plaintiffs”), each by and through their undersigned counsel, filed the *Joinder of Putative Class Plaintiffs and Motion for an Order (I) Authorizing Putative Class Plaintiffs to File Motions for Class Certification and the Full Briefing Thereof by All Parties; (II) Authorizing the Adjudication of Motions for Class Certification; and (III) Allowing the Class Actions to Proceed Against Non Debtor Parties* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). A copy of the Motion is served upon you with this notice.

¹ The Debtors in these Chapter 11 cases, along with the four digits of each Debtor’s federal tax identification number, as applicable, are as follows: Avant Gardner LLC (6504), EZ Festivals LLC (8854), AGDP Holding Inc. (6404), AG Management Pool LLC (9962), Made Event LLC (6272), Reynard Productions LLC (3431).

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the Motion must be filed with the Bankruptcy Court, 824 North Market Street, Wilmington, Delaware 19801, on or before **November 18, 2025 at 4:00 p.m. (prevailing Eastern Time)** and served upon the undersigned counsel.

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the Motion will be scheduled on **November 25, 2025 at 10:30 a.m. (prevailing Eastern Time)** before the Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THE MOTION IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: November 10, 2025
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

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Attorneys for Plaintiffs

Billy Ting, Duoc Vo, Garry Huang, Jeffrey Wang, Joshua Chin, and Willy Ngo, on behalf of themselves and all others similarly situated, and for Plaintiffs Brett Carter, Christopher Adams, Daniel Ahn, Daniel Chiu, Jin Ang, Chan Jeon, John Sun, Joshua Friedman, Timmy Howard, and Weichieh Chi, on behalf of themselves and all others similarly situated

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**ORDER GRANTING MOTION OF PUTATIVE CLASS ACTION PLAINTIFFS FOR AN
ORDER (I) AUTHORIZING PUTATIVE CLASS PLAINTIFFS TO FILE MOTIONS
FOR CLASS CERTIFICATION AND THE FULL BRIEFING THEREOF BY ALL
PARTIES; (II) AUTHORIZING THE ADJUDICATION OF MOTIONS FOR CLASS
CERTIFICATION; AND (III) ALLOWING THE CLASS ACTIONS
TO PROCEED AGAINST NON-DEBTOR PARTIES**

Upon the Motion² of Plaintiffs Brett Carter, Christopher Adams, Daniel Ahn, Daniel Chiu, Jin Ang, Chan Jeon, John Sun, Joshua Friedman, Timmy Howard, and Weichieh Chi (collectively, the “Carter Plaintiffs”), and Billy Ting, Duoc Vo, Garry Huang, Jeffrey Wang, Joshua Chin, and Willy Ngo (collectively, the “EZ Plaintiffs”), by and through their undersigned counsel, for entry of an order (this “Order”) pursuant to 11 U.S.C. § 362(d) lifting the automatic stay to (a) authorize putative class plaintiffs to file motions for class certification and the full briefing thereof by all parties in the Class Actions;³ (b) authorize both the Supreme Court of the State of New York, County of Kings, and the U.S. District Court for the Southern District of New York to hear, determine, rule, and adjudicate motions for class certification in the respective Class Actions;

¹ The Debtors in these Chapter 11 cases, along with the four digits of each Debtor’s federal tax identification number, as applicable, are as follows: Avant Gardner LLC (6504), EZ Festivals LLC (8854), AGDP Holding Inc. (6404), AG Management Pool LLC (9962), Made Event LLC (6272), Reynard Productions LLC (3431).

² Capitalized terms used but not defined have the meaning ascribed in the Motion.

³ The term Class Actions refers to the cases respectively captioned, *Avchukov, et al. v. Avant Gardner, LLC, et al.*, Case No. 1:23-cv-08106 (the “SDNY Action”), and *Brett Carter, et al. v. Alegria Productions Inc., Avant Gardner, LLC, AG Security Group Inc., and Stewart Purchaser LLC*, Index No. 521124/2023 (N.Y. Sup. Ct., Kings Cnty.) (the “Kings County Action” and together with the SDNY Action, the “Class Actions”).

(c) lift the automatic stay for all purposes as against all non-Debtor⁴ parties in the Class Actions; and (d) provide related relief.

It is hereby ORDERED that:

1. The Motion is GRANTED.
2. The automatic stay under section 362 of the Bankruptcy Code is hereby lifted pursuant to section 362(d) of the Bankruptcy Code on a limited basis with respect to the Class Actions, and both the Supreme Court of the State of New York, County of Kings, and the United States District Court for the Southern District of New York are authorized to hear, determine, rule and adjudicate any class certification motions filed by putative class plaintiffs in the respective Class Actions, and the parties to the Class Actions are hereby permitted and authorized to file any pleadings, briefs or other documents related to the pursuit, adjudication and/or resolution of any class certification motion.
3. The automatic stay under section 362 of the Bankruptcy Code is hereby lifted pursuant to section 362(d) of the Bankruptcy Code as against all non-debtors with respect to the Kings County Action.
4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

⁴ The non-debtors who are defendants in the Kings County Action include: Alegria Enterprises Inc. and Stewart Purchaser LLC. The non-debtors who are defendants in the SDNY Action include: Cityfox, Gardner Purchaser LLC, Jurgen Bildstein, Phillip Wiederkehr, Stewart Purchaser LLC, Wiederkehr Associates, WRE Holding AG, WRE Management LLC, and WRE Parent US Holding Corp. Inc.

CERTIFICATE OF SERVICE

I, Matthew P. Ward, do hereby certify that on November 10, 2025, I caused a copy of the foregoing *Joinder of Putative Class Plaintiffs and Motion for an Order (I) Authorizing Putative Class Plaintiffs to File Motions for Class Certification and the Full Briefing Thereof by All Parties; (II) Authorizing the Adjudication of Motions for Class Certification; and (III) Allowing the Class Actions to Proceed Against Non Debtor Parties* to be served on all parties of record via CM/ECF and via electronic mail and/or first-class mail on the parties listed on the service list attached.

/s/ Matthew P. Ward

Matthew P. Ward (DE Bar No. 4471)

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Phone	Fax	Email
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Alabama State AG	Alabama Attorney General	Attn Bankruptcy Department	501 Washington Ave	PO Box 300152		Montgomery	AL	36104-0152		334-242-7300		consumerinterest@Alabamaag.gov
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IRS	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346		800-973-0424	855-235-6787	anastasia.sotiropoulos@hkllaw.com;
IRS	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St			Philadelphia	PA	19104			855-235-6787	joshua.spencer@hkllaw.com
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Committee Member	Lauren Bair											Email on File
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Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Phone	Fax	Email
Counsel for AmTrust North America, Inc. on behalf of Republic - Vanguard Insurance Company	Maurice Wutscher, LLP	Alan C. Hochheiser	23611 Chagrin Blvd. Suite 207			Beachwood	OH	44122		216-220-1129	216-472-8510	ahochheiser@mauricewutscher.com
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