

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AGDP HOLDING INC., <i>et al.</i> , ¹	Case No. 25-11446 (MFW)
Debtors.	(Jointly Administered)
	Obj. Deadline: November 24, 2025 at 4:00 p.m. (ET)

**SUMMARY OF SECOND MONTHLY APPLICATION OF MORRIS JAMES LLP,
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

Name of Applicant	<u>Morris James LLP</u>
Authorized to provide professional services to:	<u>Official Committee of Unsecured Creditors of AGDP holding Inc., <i>et al.</i></u>
Date of retention order:	<u>October 1, 2025 effective as of August 20, 2025</u>
Period for which compensation and reimbursement sought:	<u>October 1, 2025 through October 31, 2025</u>
Compensation sought as actual, reasonable, and necessary:	<u>\$63,817.60 (80% of \$79,772.00)</u>
Expense reimbursement sought as actual, reasonable, and necessary:	<u>\$187.63</u>
This is a(n):	<u> X </u> monthly <u> </u> interim <u> </u> final

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.



Previous Applications:

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Fees Requested	Total Expenses Requested	CNO Filing Date & Docket No.	Amount of Fees Authorized to be Paid	Amount of Expenses Authorized to be Paid
10/22/2025 [D.I. 357]	August 20, 2025 – October 31, 2025	\$144,093.50	\$693.02	11/6/2025 [D.I. 409]	\$115,274.80	\$693.02
TOTALS		\$144,093.50	\$693.02		\$115,274.80	\$693.02

**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)

Obj. Deadline: November 24, 2025 at 4:00 p.m. (ET)

**SECOND MONTHLY APPLICATION OF MORRIS JAMES LLP, CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

Morris James LLP (“Morris James”), co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) of AGDP holding Inc., *et al.*, the above-captioned debtors (the “Debtors”), hereby submits its monthly fee application (the “Application”) pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§101 et seq., as amended (the “Bankruptcy Code”) for allowance of compensation in the amount of \$79,772.00 and reimbursement of expenses in the amount \$187.63 for the period from October 1, 2025 through October 31, 2025 (the “Compensation Period”), and in support thereof, Morris James respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (B).

2. Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§1408 and 1409.

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. The statutory predicate for the relief sought herein is sections 1103 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

BACKGROUND

4. On August 4, 2025, (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively the “Chapter 11 Cases”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

5. The Debtors have continued in the possession of its property and has continued to operate and manage its business as Debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On August 18, 2025, the United States Trustee for the District of Delaware (the “United States Trustee”) filed its *Notice of Appointment* [Docket No. 73] of the seven (7) member Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. On August 19, 2025, the Committee selected Orrick, Herrington & Sutcliffe LLP as its lead counsel. On August 20, 2025, Morris James was selected as its Delaware counsel and IslandDundon LLC was selected as the Committee’s financial advisor.

7. On August 21, 2025, the Debtors filed its *Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* (the “Interim Compensation Motion”) [Docket No. 90], and on September 2, 2025, the Court entered an Order approving the Interim Compensation Motion (the “Interim Compensation Order”) [Docket No. 132].

8. On September 15, 2025, the Committee filed the *Application for Entry of an Order Authorizing the Retention and Employment of Morris James LLP as Co-Counsel to the Official*

Committee of Unsecured Creditors Effective as of August 20, 2025 (the “Retention Application”) [Docket No 193]. On October 1, 2025, the Court entered an order approving the Retention Application, Effective as of August 20, 2025 [Docket No. 257].

9. A chart detailing the fees during the Compensation Period, by professional and by category and a full and detailed statement describing the services rendered during the Compensation Period, by each professional and paraprofessional at Morris James are both attached as **Exhibit A**.

10. The total sum due to Morris James for professional services rendered on behalf of the Committee during the Compensation Period is \$79,772.00 Morris James submits that the professional services it rendered on behalf of the Committee during this time were reasonable and necessary.

11. Morris James incurred \$187.63 of expenses during the Compensation Period. A chart detailing the specific disbursements is attached hereto as **Exhibit B**.

12. The undersigned hereby attests that he has reviewed the requirements of Local Rule 2016-1 and this Application conforms to such requirements, including that travel time was not billed at more than half rate and copying charges were only \$.10 per page.

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WHEREFORE, Morris James hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (i) interim allowance of compensation for necessary and valuable professional services rendered to the Committee in the amount of \$79,772.00 and reimbursement of expenses in the amount of \$187.63 for the period from October 1, 2025 through October 31, 2025; (ii) payment in the total amount of \$64,005.23 (representing 80% of the total fees (\$63,817.60) billed and 100% of the expenses (\$187.63) incurred during the Compensation Period); and (iii) such other relief as this Court deems just and proper.

Dated: November 10, 2025

MORRIS JAMES LLP

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)
Siena B. Cerra (DE Bar No. 7290)
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Telephone: (302) 888-6800
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scerra@morrisjames.com

*Counsel to the Official Committee of Unsecured
Creditors*

**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)

Obj. Deadline: November 24, 2025 at 4:00 p.m. (ET)

**NOTICE OF SECOND MONTHLY APPLICATION OF MORRIS JAMES LLP,
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

PLEASE TAKE NOTICE that on November 10, 2025, Morris James LLP filed its second monthly application (the “Application”) seeking compensation for services rendered and reimbursement of expenses incurred as co-counsel to the Official Committee of Unsecured Creditors appointed in the above-referenced bankruptcy case (the “Committee”) for the period from October 1, 2025 through October 31, 2025 with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that if you object to the relief sought by the Application, you are required to file a response to the Application, on or before **November 24, 2025 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must also serve a copy of the response upon undersigned counsel to the Committee.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

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.

Dated: November 10, 2025

MORRIS JAMES LLP

/s/ Eric J. Monzo

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Siena B. Cerra (DE Bar No. 7290)
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-and-

ORRICK, HERRINGTON & SUTCLIFFE LLP

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*Counsel to the Official Committee of Unsecured
Creditors*

EXHIBIT A**Compensation By Category – Second Monthly Compensation Period**

Project Category	Total Hours	Total Fees
B110 Case Administration	27.80	\$18,403.00
B130 Asset Disposition	4.10	\$3,128.50
B140 Relief from Stay/Adequate Protection Proceedings	0.40	\$362.00
B150 Meetings/Communications with Committee and/or Creditors	11.70	\$9,073.50
B160 Retention Applications (MJ)	0.10	\$90.50
B165 Retention Applications (Others)	0.40	\$258.00
B170 Fee Applications (MJ)	5.90	\$2,887.00
B175 Fee Applications (Others)	14.00	\$10,226.50
B185 Assumption/Rejection of Leases and Contracts	0.70	\$585.50
B190 Other Contested Matters (excluding assumption/rejection motions)	27.60	\$20,509.00
B220 Employee Benefits/Pensions	0.60	\$543.00
B230 Financing/Cash Collateral	7.40	\$5,735.00
B310 Claims Administration and Objections	0.50	\$452.50
B320 Plan and Disclosure Statement	3.00	\$2,475.00
B430A Court Hearings: Attendance and Preparation	5.70	\$5,043.00
Totals	109.90	\$79,772.00

Timekeeper Summary – Second Monthly Compensation Period

Timekeeper	Position	Rate	Hours	Amount
Eric J. Monzo	Member of the Delaware Bar since 2008; Partner in Bankruptcy Department since 2014	\$905.00	32.40	\$29,322.00
Brya M. Keilson	Member of the Delaware Bar since 2005; Partner in Bankruptcy Department since 2019	\$850.00	42.10	\$35,785.00
Jason S. Levin	Member of the Delaware Bar since 2017; Associate in Bankruptcy Department since 2020	\$525.00	4.80	\$2,520.00
Siena B. Cerra	Member of the Delaware Bar since 2023; Associate in Bankruptcy Department since 2023	\$425.00	9.10	\$3,867.50
Stephanie A. Lisko	Paralegal in Bankruptcy Department since 2020	\$385.00	5.70	\$2,194.50
Douglas J. Depta	Paralegal in Bankruptcy Department since 2020	\$385.00	10.80	\$4,158.00
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2025	\$385.00	5.00	\$1,925.00
Totals			109.90	\$79,772.00
Blended Rate \$725.86				

Morris James^{L L P}

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Wilmington, Delaware 19899-2306
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Facsimile (302) 571-1750
Federal Tax I.D. 51-0023480

AGDP Holding Inc., Official Committee of Unsecured Creditors
Kelly Weiss (Co-Chairperson of the Committee)
Aaron Clevenger c/o Wasserman Music LLC
10900 Wilshire Blvd., Los Angeles, CA 90024
Kelly.weiss@teamwass.com

November 6, 2025
Invoice 621489

Matter Name: AGDP Holding Inc., Case No. 25-11446-MFW
Matter Number: 146863-0001
Attorney: Eric J. Monzo

For Professional Services through October 31, 2025

Fees	\$79,772.00
Disbursements	\$187.63
Total Charges	\$79,959.63

Fee Recap

		Hours	Rate/Hours	Amount
Brya M. Keilson	Partner	42.10	850.00	35,785.00
Eric J. Monzo	Partner	32.40	905.00	29,322.00
Siena B. Cerra	Associate	9.10	425.00	3,867.50
Jason S. Levin	Associate	4.80	525.00	2,520.00
Douglas J. Depta	Paralegal	10.80	385.00	4,158.00
Stephanie A. Lisko	Paralegal	5.70	385.00	2,194.50
Jessica M. O'Connor	Paralegal	5.00	385.00	1,925.00
Totals		109.90		79,772.00

Matter Number: 146863-0001

11/06/25

Page 2

Services by Task Code

		Hours	Amount
B110	Case Administration	27.80	18,403.00
B130	Asset Disposition	4.10	3,128.50
B140	Relief from Stay/Adequate Protection Proceedings	0.40	362.00
B150	Meetings/Communications with Committee and/or Creditors	11.70	9,073.50
B160	Retention Applications (MJ)	0.10	90.50
B165	Retention Applications (Others)	0.40	258.00
B170	Fee Applications (MJ)	5.90	2,887.00
B175	Fee Applications (Others)	14.00	10,226.50
B185	Assumption/Rejection of Leases and Contracts	0.70	585.50
B190	Other Contested Matters (excluding assumption/rejection motions)	27.60	20,509.00
B220	Employee Benefits/Pensions	0.60	543.00
B230	Financing/Cash Collateral	7.40	5,735.00
B310	Claims Administration and Objections	0.50	452.50
B320	Plan and Disclosure Statement	3.00	2,475.00
B430A	Court Hearings: Attendance and Preparation	5.70	5,043.00
Totals		109.90	\$79,772.00

Fees

Date	Atty	Description	Hours	Rate	Amount
B110 Case Administration					
10/01/25	SAL	Review pleadings filed and reconcile and update critical dates, case calendar, and folder.	0.50	385.00	192.50
10/01/25	DJD	Research case law re committee 2019 statement and emails internally re same.	0.40	385.00	154.00
10/01/25	SBC	Analyze 2019 disclosure requirements and relevant case law (1.5); corresponded with Morris James team regarding findings and applicability (0.4); prepared summary of analysis for co-counsel (0.6).	2.50	425.00	1,062.50
10/01/25	SBC	Analyze 2019 statement draft and discuss same with E. Monzo.	0.30	425.00	127.50
10/01/25	EJM	Emails with co-counsel and strategy re Committee statement and internal research and discussion.	0.70	905.00	633.50
10/01/25	EJM	Review operating reports.	0.40	905.00	362.00
10/01/25	JSL	Review emails re case status, strategy, and recent filings.	0.80	525.00	420.00
10/01/25	SAL	Review and internally circulate agenda cancelling October 3 hearing and update case calendar.	0.10	385.00	38.50

Matter Number: 146863-0001

11/06/25

Page 3

Date	Atty	Description	Hours	Rate	Amount
10/01/25	BMK	Emails with professionals regarding 2019 statement and updates.	1.10	850.00	935.00
10/01/25	BMK	Review recently filed pleadings.	0.90	850.00	765.00
10/02/25	EJM	Emails re update on inquiry on 2019 statement and review claims.	0.50	905.00	452.50
10/02/25	SBC	Analyze 2019 disclosure requirements and relevant case law (0.3); prepare and revise summary of analysis for co-counsel (0.3).	0.60	425.00	255.00
10/02/25	JSL	Review Committee 2019 statement.	0.10	525.00	52.50
10/02/25	SBC	Correspondence with co-counsel re 2019 disclosure requirements.	0.30	425.00	127.50
10/02/25	SBC	Review filing version of 2019 statement and correspond with internally re filing.	0.30	425.00	127.50
10/02/25	EJM	Update on Committee statement and emails with co-counsel and internally.	0.80	905.00	724.00
10/02/25	EJM	Review amended schedules.	0.30	905.00	271.50
10/02/25	SAL	Emails with S. Cerra and co-counsel re 2019 statement, draft CoS for same, and prepare service lists.	0.50	385.00	192.50
10/02/25	SAL	Finalize, file, and serve 2019 statement.	0.40	385.00	154.00
10/06/25	SAL	Review pleadings filed and update and reconcile critical dates, case calendar, and folder.	0.40	385.00	154.00
10/06/25	BMK	Review recently filed pleadings.	1.10	850.00	935.00
10/07/25	EJM	Updates re hearing status and emails with co-counsel and counsel to the United States Trustee.	0.20	905.00	181.00
10/07/25	EJM	Review agenda canceling hearing.	0.10	905.00	90.50
10/07/25	SAL	Review agenda cancelling October 9 hearing, email E. Monzo re same, and update case calendar.	0.10	385.00	38.50
10/07/25	BMK	Review recently filed pleadings.	1.30	850.00	1,105.00
10/10/25	SAL	Review pleadings filed and update critical dates, case calendar, and folder.	0.20	385.00	77.00
10/10/25	EJM	Review notice canceling auction and designating stalking horse bidder.	0.30	905.00	271.50
10/13/25	DJD	Review relevant pleadings and update case folder and calendar.	0.30	385.00	115.50
10/14/25	SAL	Review pleadings filed and update critical dates, case calendar, and folder.	0.30	385.00	115.50
10/14/25	BMK	Review recently filed pleadings.	1.10	850.00	935.00
10/15/25	SAL	Review pleadings filed and reconcile and update critical dates and case calendar.	0.40	385.00	154.00
10/16/25	SAL	Review pleadings filed and update critical dates, case calendar, and folder.	0.20	385.00	77.00
10/17/25	SAL	Update critical dates and case calendar.	0.20	385.00	77.00
10/20/25	SAL	Emails with B. Keilson and co-counsel re r October 22 hearing and register appearances for same.	0.30	385.00	115.50
10/20/25	EJM	Review Notice of Agenda.	0.10	905.00	90.50
10/20/25	BMK	Emails with co-counsel and team regarding upcoming hearing.	0.90	850.00	765.00
10/20/25	BMK	Emails with co-counsel and S. Lisko regarding upcoming hearing.	0.70	850.00	595.00
10/21/25	SAL	Review pleadings filed and update case folder.	0.20	385.00	77.00
10/21/25	SAL	Prepare virtual agenda binder for October 23 hearing.	0.40	385.00	154.00
10/21/25	SAL	Emails with B. Keilson re witness and exhibit list	0.10	385.00	38.50

Matter Number: 146863-0001

11/06/25

Page 4

Date	Atty	Description	Hours	Rate	Amount
10/22/25	SAL	requirement for Walrath. Review pleadings filed and update critical dates, case calendar, and folder.	0.40	385.00	154.00
10/22/25	SAL	Emails from E. Monzo and chambers re continuation of October 22 hearing and update case calendar.	0.10	385.00	38.50
10/22/25	DJD	Email transcriber re October 22 hearing transcript.	0.10	385.00	38.50
10/23/25	EJM	Case update and discussion with P. Hurwitz following hearing.	0.30	905.00	271.50
10/23/25	EJM	Emails with Chambers and internally re motion for leave and response to inquiry.	0.20	905.00	181.00
10/23/25	DJD	Review October 22 hearing transcript, circulate, and update case folder.	0.20	385.00	77.00
10/24/25	DJD	Review updated transcript, emails with transcriber and co-counsel, and update case folder.	0.20	385.00	77.00
10/24/25	SAL	Review pleadings filed and update critical dates, case calendar and folder.	0.30	385.00	115.50
10/27/25	DJD	Review relevant pleadings and update case folder.	0.10	385.00	38.50
10/27/25	EJM	Review monthly operating reports.	0.40	905.00	362.00
10/27/25	BMK	Review pleadings.	0.80	850.00	680.00
10/28/25	DJD	Review relevant pleadings and update case folder and calendar.	0.20	385.00	77.00
10/29/25	DJD	Review relevant pleadings and update case folder.	0.20	385.00	77.00
10/29/25	BMK	Review recently filed pleadings.	1.10	850.00	935.00
10/30/25	DJD	Review relevant pleadings and update case folder.	0.10	385.00	38.50
10/31/25	DJD	Review relevant pleadings and update case folder and calendar.	0.60	385.00	231.00
10/31/25	EJM	Emails with all counsel re operations.	0.30	905.00	271.50
10/31/25	BMK	Review recently filed pleadings.	1.80	850.00	1,530.00
Task Code Subtotal			27.80		18,403.00
B130 Asset Disposition					
10/17/25	EJM	Review proposed sale Order.	0.60	905.00	543.00
10/17/25	EJM	Emails with co-counsel and internally re reply in support of sale.	0.20	905.00	181.00
10/18/25	EJM	Review revised stalking horse agreement.	0.50	905.00	452.50
10/18/25	EJM	Review updates to draft declaration of financial advisor re valuation and hearing.	0.20	905.00	181.00
10/20/25	EJM	Review TVT joinder to MICA sale objection.	0.20	905.00	181.00
10/20/25	EJM	Review MCA Funders objection to sale.	0.40	905.00	362.00
10/21/25	EJM	Updates with professionals re pending objections.	0.60	905.00	543.00
10/21/25	SBC	Reviewed and analyzed declarations supporting the sale of the Debtors' assets to assess factual representations and implications.	0.50	425.00	212.50
10/23/25	JSL	Review revised proposed sale order (.6); review filings re settlement (.3).	0.90	525.00	472.50
Task Code Subtotal			4.10		3,128.50
B140 Relief from Stay/Adequate Protection Proceedings					
10/02/25	EJM	Review class certification motion to list automatic stay.	0.40	905.00	362.00

Matter Number: 146863-0001

11/06/25

Page 5

Date	Atty	Description Task Code Subtotal	Hours 0.40	Rate	Amount 362.00
B150 Meetings/Communications with Committee and/or Creditors					
10/01/25	EJM	Review committee call agenda and internal discussion.	0.20	905.00	181.00
10/02/25	EJM	Review updated agenda and financial presentation for committee discussion.	0.30	905.00	271.50
10/03/25	SBC	Attend weekly committee meeting.	0.30	425.00	127.50
10/03/25	EJM	Emails with committee re update on milestones.	0.40	905.00	362.00
10/03/25	EJM	Internal update following committee call.	0.60	905.00	543.00
10/03/25	BMK	Emails with co-counsel and committee regarding bar date and claim form and review same.	0.80	850.00	680.00
10/06/25	SBC	Attend continued 341 meeting (1.0); prepare summary notes re same (.8).	1.80	425.00	765.00
10/06/25	EJM	Update internally on 341 meeting.	0.40	905.00	362.00
10/08/25	EJM	Email update to committee re case status.	0.20	905.00	181.00
10/08/25	BMK	Emails with co-counsel and committee regarding updates and review relevant documents.	0.70	850.00	595.00
10/15/25	BMK	Emails with co-counsel and committee regarding updates and review relevant documents.	0.70	850.00	595.00
10/16/25	SBC	Attend weekly committee call.	0.30	425.00	127.50
10/16/25	EJM	Attend weekly committee meeting.	0.40	905.00	362.00
10/22/25	EJM	Emails with committee re case update and meeting schedule.	0.20	905.00	181.00
10/22/25	BMK	Emails with co-counsel and committee regarding updates and report by Dundon and review report.	1.10	850.00	935.00
10/29/25	BMK	Emails with co-counsel and committee regarding updates and review reports.	1.40	850.00	1,190.00
10/31/25	BMK	Emails with committee professionals and committee regarding analysis of SOFAs and Schedules and review analysis and SOFAs and Schedules.	1.90	850.00	1,615.00
Task Code Subtotal			11.70		9,073.50
B160 Retention Applications (MJ)					
10/01/25	EJM	Review Order approving retention.	0.10	905.00	90.50
Task Code Subtotal			0.10		90.50
B165 Retention Applications (Others)					
10/01/25	EJM	Review Orders authorizing co-counsel employment applications.	0.20	905.00	181.00
10/01/25	SAL	Review entry of retention orders and email professionals re same.	0.20	385.00	77.00
Task Code Subtotal			0.40		258.00
B170 Fee Applications (MJ)					
10/06/25	DJD	Review and update September invoice and emails internally re updates.	1.00	385.00	385.00
10/08/25	DJD	Continue review and updating and September invoice and emails internally re updates.	0.40	385.00	154.00
10/09/25	DJD	Update first monthly application and email internally re	1.00	385.00	385.00

Matter Number: 146863-0001

11/06/25

Page 6

Date	Atty	Description	Hours	Rate	Amount
		same.			
10/09/25	EJM	Updates re fee applications.	0.20	905.00	181.00
10/10/25	BMK	Emails with D. Depta regarding draft fee application and review same.	1.10	850.00	935.00
10/22/25	DJD	Update and file first monthly application, email counsel for service, arrange mail service, and update case folder and calendar.	0.50	385.00	192.50
10/29/25	DJD	Begin drafting first interim application.	0.50	385.00	192.50
10/30/25	DJD	Begin drafting second monthly application.	0.40	385.00	154.00
10/30/25	DJD	Continue drafting first interim application and emails with co-counsel re same.	0.50	385.00	192.50
10/30/25	DJD	Draft CNO re MJ first monthly application.	0.30	385.00	115.50
Task Code Subtotal			5.90		2,887.00
B175 Fee Applications (Others)					
10/08/25	EJM	Review financial advisor monthly fee application.	0.20	905.00	181.00
10/08/25	BMK	Emails with committee professionals regarding draft fee applications and review same.	0.90	850.00	765.00
10/09/25	DJD	Review and update Dundon first monthly application emails re updates.	0.70	385.00	269.50
10/10/25	DJD	Update and file Dundon first monthly application, emails with Orrick, email counsel for service, arrange mail service, and update case folder and calendar.	0.60	385.00	231.00
10/10/25	EJM	Emails with co-counsel and internally re fee applications and review same.	0.20	905.00	181.00
10/10/25	EJM	Emails with co-counsel re fee application.	0.20	905.00	181.00
10/10/25	BMK	Emails with committee professionals regarding draft fee applications and finalizing same (.7); review drafts (.9).	1.60	850.00	1,360.00
10/10/25	BMK	Emails with committee professionals and D. Depta regarding draft fee applications and review same.	1.10	850.00	935.00
10/14/25	EJM	Review YCST fee application.	0.30	905.00	271.50
10/22/25	DJD	Review, update, and file Orrick first monthly application, email counsel for service, arrange mail service, and update case folder and calendar.	1.10	385.00	423.50
10/22/25	EJM	Finalize first monthly fee applications.	0.20	905.00	181.00
10/22/25	BMK	Emails with committee professionals regarding draft fee applications and filing same (.6); review drafts (.9).	1.50	850.00	1,275.00
10/23/25	DJD	Draft CNO re Dundon first monthly application.	0.30	385.00	115.50
10/24/25	DJD	Emails with Orrick and UST re LEDES data.	0.20	385.00	77.00
10/27/25	DJD	File CNO re Dundon first monthly application, circulate, and update case folder.	0.30	385.00	115.50
10/27/25	BMK	Emails with D. Depta and Dundon regarding pending fee application and draft CNO and review same.	0.70	850.00	595.00
10/28/25	EJM	Internal emails re fee application inquiry of co-counsel.	0.20	905.00	181.00
10/28/25	BMK	Emails with committee professionals and D. Depta regarding fee applications and updates.	0.70	850.00	595.00
10/29/25	EJM	Emails with co-counsel re interim fee application.	0.20	905.00	181.00
10/29/25	DJD	Emails internally and with co-counsel re interim applications and deadlines.	0.30	385.00	115.50
10/29/25	BMK	Emails with co-counsel regarding fee applications and updates.	0.80	850.00	680.00

Matter Number: 146863-0001

11/06/25

Page 7

Date	Atty	Description	Hours	Rate	Amount
10/30/25	DJD	Draft CNO re Orrick first monthly application.	0.30	385.00	115.50
10/31/25	EJM	Emails with co-counsel re interim fee hearing.	0.20	905.00	181.00
10/31/25	BMK	Emails with committee professionals and team regarding interim fee applications and updates and review same.	1.20	850.00	1,020.00
Task Code Subtotal			14.00		10,226.50
B185 Assumption/Rejection of Leases and Contracts					
10/16/25	EJM	Review Order authorizing rejection of contracts.	0.20	905.00	181.00
10/29/25	EJM	Review Order authorizing lease rejection.	0.20	905.00	181.00
10/30/25	SBC	Analyze rejection order.	0.10	425.00	42.50
10/31/25	EJM	Review filings re executory contacts.	0.20	905.00	181.00
Task Code Subtotal			0.70		585.50
B190 Other Contested Matters (excluding assumption/rejection motions)					
10/01/25	EJM	Review Axar settlements documents and motion.	1.10	905.00	995.50
10/01/25	EJM	Review sealed complaint.	0.50	905.00	452.50
10/01/25	EJM	Review authority and update re settlement and disclosure.	1.10	905.00	995.50
10/01/25	SBC	Analyze TVT amended complaint (.3); emails with Debtor and committee professionals re same (.1).	0.40	425.00	170.00
10/02/25	JSL	Review filed settlement with Axar.	0.50	525.00	262.50
10/10/25	EJM	Review notices re InstaFunding.	0.10	905.00	90.50
10/13/25	EJM	Review White Star brief in support of motion to dismiss complaint.	0.40	905.00	362.00
10/15/25	SBC	Review TVT 9019 objection.	0.40	425.00	170.00
10/15/25	SAL	Email from co-counsel re sealed exhibits to objection to settlement and update case folder.	0.10	385.00	38.50
10/15/25	BMK	Emails with committee professionals regarding pending objections to settlement and review pleadings.	1.80	850.00	1,530.00
10/16/25	SAL	Emails with co-counsel re reply to 9019 motion.	0.20	385.00	77.00
10/16/25	EJM	Review 2004 exam motions and emails with co-counsel.	0.70	905.00	633.50
10/16/25	BMK	Emails with co-counsel regarding 9019 motion and pending objections and review same.	1.90	850.00	1,615.00
10/17/25	JMO	Communications with internal team re drafting motion to file late reply to 9019 objection.	0.40	385.00	154.00
10/17/25	JMO	Draft motion for leave to file reply to 9019 objection.	0.90	385.00	346.50
10/17/25	JMO	Communications with internal team re draft motion for leave to file reply to 9019 objections.	0.10	385.00	38.50
10/17/25	JMO	Draft cos and service list re motion to file late reply.	0.40	385.00	154.00
10/17/25	JMO	Communications with internal team and Orrick team re filing motion for leave to file reply to 9019 motion.	0.30	385.00	115.50
10/17/25	EJM	Discussion and emails with co-counsel re 2004 motion and settlement.	0.30	905.00	271.50
10/17/25	EJM	Discussion with K. Guerke re status of litigation and 2004 examination.	0.40	905.00	362.00
10/17/25	EJM	Discussion with B. Keilson re update and strategy on motion for 2004 examination.	0.30	905.00	271.50
10/17/25	EJM	Emails internally and review draft re motion in support of late reply.	0.20	905.00	181.00
10/17/25	BMK	Emails with E. Monzo and co-counsel regarding pending 2004 motion and review motion.	1.10	850.00	935.00

Matter Number: 146863-0001

11/06/25

Page 8

Date	Atty	Description	Hours	Rate	Amount
10/17/25	BMK	Emails with committee professionals regarding draft reply in support of settlement.	0.90	850.00	765.00
10/18/25	EJM	Emails with co-counsel and financial advisors re preparation for sale hearing and reply to support positions on settlement.	0.30	905.00	271.50
10/18/25	BMK	Emails with committee professionals regarding reply in support of settlement and declaration and updates.	1.10	850.00	935.00
10/18/25	JSL	Review emails from Committee professionals re settlement and case strategy.	0.60	525.00	315.00
10/19/25	BMK	Emails with committee professionals regarding draft reply in support of settlement and declaration (.8); review drafts (.9).	1.70	850.00	1,445.00
10/20/25	JMO	Communications with internal team re reply to 9019 objections and corresponding documents and filing of same.	0.40	385.00	154.00
10/20/25	JMO	Communications with internal team and Orrick team re motion for leave to file late reply.	0.30	385.00	115.50
10/20/25	JMO	Draft notice to motion for leave to file reply to 9019 motion.	0.20	385.00	77.00
10/20/25	JMO	Communications with Orrick team and internal team re finalized reply to 9019 objection and motion for leave and filing of same.	0.50	385.00	192.50
10/20/25	JMO	Finalize motion for leave iso reply to 9019 settlement; file same.	0.40	385.00	154.00
10/20/25	JMO	Finalize reply iso 9019 settlement; file same.	0.40	385.00	154.00
10/20/25	JMO	Circulate filed reply and motion for leave to 9019 global settlement.	0.10	385.00	38.50
10/20/25	JMO	Service email re filed motion for leave to file reply iso 9019 settlement.	0.10	385.00	38.50
10/20/25	JMO	Update deadline calendar re motion for leave to file reply iso 9019.	0.10	385.00	38.50
10/20/25	SAL	Review rules re motion for leave to file late reply and emails with J. O'Connor re same.	0.10	385.00	38.50
10/20/25	BMK	Emails with team and co-counsel regarding draft reply in support of settlement and motion for leave (.8); review drafts (1.1).	1.90	850.00	1,615.00
10/23/25	JMO	Communications with internal team re proposed order to motion for leave to file response to 9019.	0.20	385.00	77.00
10/23/25	JMO	Review order granting motion for leave; circulate same.	0.20	385.00	77.00
10/23/25	EJM	Review portions of hearing transcript re court ruling on settlement.	0.30	905.00	271.50
10/23/25	SBC	Review order granting committee's leave to file a late reply.	0.10	425.00	42.50
10/24/25	EJM	Review Order approving settlement.	0.20	905.00	181.00
10/24/25	SBC	Analyze Axar 9019 order.	0.20	425.00	85.00
10/24/25	BMK	Review documents and draft objection to 2004 motion.	1.80	850.00	1,530.00
10/25/25	BMK	Emails with E. Monzo regarding pending 2004 motion and updates.	0.80	850.00	680.00
10/26/25	EJM	Emails with counsel to movant and co-counsel re status of 2004 motion request directed to the Committee.	0.20	905.00	181.00
10/27/25	EJM	Updates with counsel to movant and with co-counsel re motion for 2004 examination.	0.20	905.00	181.00

Matter Number: 146863-0001

11/06/25

Page 9

Date	Atty	Description	Hours	Rate	Amount
10/27/25	EJM	Review complaint of InstaFunding.	0.70	905.00	633.50
Task Code Subtotal			27.60		20,509.00
B220 Employee Benefits/Pensions					
10/08/25	EJM	Review motion to pay severance.	0.40	905.00	362.00
10/24/25	EJM	Review Order approving severance program.	0.20	905.00	181.00
Task Code Subtotal			0.60		543.00
B230 Financing/Cash Collateral					
10/01/25	EJM	Review final DIP Order.	0.50	905.00	452.50
10/15/25	EJM	Review objections to settlement and DIP financing.	2.00	905.00	1,810.00
10/16/25	JSL	Review limited objection, joinders, and reservation of rights re DIP (.5); review Debtors motion for entry of approval of disclosure statement (.8).	1.30	525.00	682.50
10/20/25	EJM	Review debtors reply in support of DIP and global settlement.	0.80	905.00	724.00
10/20/25	EJM	Finalize reply and related filings re support to committee settlement.	0.80	905.00	724.00
10/22/25	EJM	Review financial update.	0.30	905.00	271.50
10/24/25	SBC	Reviewed and analyzed cash collateral order entered in the case to assess terms and implications.	0.50	425.00	212.50
10/27/25	JSL	Review final DIP and settlement orders.	0.60	525.00	315.00
10/31/25	EJM	Review financial analysis.	0.60	905.00	543.00
Task Code Subtotal			7.40		5,735.00
B310 Claims Administration and Objections					
10/31/25	EJM	Updates with professionals re claims analysis for Committee.	0.50	905.00	452.50
Task Code Subtotal			0.50		452.50
B320 Plan and Disclosure Statement					
10/15/25	EJM	Review plan and disclosure statement and related filings.	2.00	905.00	1,810.00
10/15/25	EJM	Review motion to approve disclosure statement.	0.50	905.00	452.50
10/15/25	SBC	Analyze plan and disclosure statement.	0.50	425.00	212.50
Task Code Subtotal			3.00		2,475.00
B430A Court Hearings: Attendance and Preparation					
10/21/25	EJM	Emails with co-counsel re inquiries on hearing status and preparation.	0.30	905.00	271.50
10/21/25	EJM	Emails with internal team re hearing preparation.	0.20	905.00	181.00
10/22/25	EJM	Attend first part of hearing on settlement motion.	1.30	905.00	1,176.50
10/22/25	EJM	Attend second part of hearing on settlement motion.	1.00	905.00	905.00
10/22/25	EJM	Prepare for hearing re objections and supporting positions.	0.80	905.00	724.00
10/22/25	BMK	Attend hearing.	2.10	850.00	1,785.00
Task Code Subtotal			5.70		5,043.00

Matter Number: 146863-0001

11/06/25

Page 10

Sub-Total Fees: 79,772.00**For Disbursements through October 31, 2025****Disbursements**

Date	Description	Amount
	Postage	40.53
	Reproduction	40.40
	Westlaw	30.23
10/01/25	Pacer Research	47.80
10/10/25	Pacer Research	9.70
10/21/25	Innovative Driven - 10/10/25 Mail Service of Dundon First Monthly Fee Application	18.97
Total Disbursements		187.63

Total Services and Disbursements this period	\$79,959.63
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Balance Due	\$79,959.63
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EXHIBIT B

Summary of Expenses – Second Monthly Compensation Period

	Total
Postage	\$40.53
Reproduction	\$40.40
Westlaw	\$30.23
Pacer	\$57.50
Innovative Driven	\$18.97
TOTAL:	\$187.63

**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)

**DECLARATION OF ERIC J. MONZO IN SUPPORT OF SECOND MONTHLY
APPLICATION OF MORRIS JAMES LLP, CO-COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

STATE OF DELAWARE :
 :
COUNTY OF NEW CASTLE :
 :

SS

I, Eric J. Monzo, after being sworn according to law, deposes and says:

a) I am a partner of the firm Morris James LLP.

b) I have personally performed or am familiar with the services rendered by Morris James LLP, co-counsel to the Official Committee of Unsecured Creditors.

c) I have reviewed the foregoing Fee Application, and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Local Rule 2016-1 and submit that the Fee Application complies with such Rule.

Dated: November 10, 2025

/s/ Eric J. Monzo
Eric J. Monzo (DE Bar No. 5214)

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.

**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)

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of November, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the *Second Monthly Application of Morris James LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period From October 1, 2025 through October 31, 2025* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and an additional service was competed via electronic mail or first class mail on the parties listed on the attached service list.

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)

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.

Service List

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and the DIP*

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United States Trustee