

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

In re:	Chapter 11
AGDP HOLDING INC., <i>et al.</i> , <sup>1</sup>	Case No. 25-11446 (MFW)
Debtors.	(Jointly Administered)
	Obj. Deadline: November 24, 2025 at 4:00 p.m. (ET)
	Hearing Date: December 18, 2025 at 3:00 p.m. (ET)

**SUMMARY OF FIRST INTERIM APPLICATION OF  
ORRICK, HERRINGTON & SUTCLIFFER LLP, CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 19, 2025 THROUGH OCTOBER 31, 2025**

Name of Applicant	<u>Orrick, Herrington &amp; Sutcliffe LLP</u>
Authorized to provide professional services to:	<u>Official Committee of Unsecured Creditors of AGDP holding Inc., et al.</u>
Date of retention order:	<u>October 1, 2025 effective as of August 19, 2025</u>
Period for which compensation and reimbursement sought:	<u>August 19, 2025 through October 31, 2025</u>
Compensation sought as actual, reasonable, and necessary:	<u>\$1,760,998.49</u>
Expense reimbursement sought as actual, reasonable, and necessary:	<u>\$18,905.13</u>
This is a(n):	<u>    </u> monthly <u>  X  </u> interim <u>    </u> final

<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.



2511446251110000000000011

## Previous Applications:

<b>Monthly Fee Application Filing Date &amp; Docket No.</b>	<b>Period Covered</b>	<b>Total Fees Requested (at 100%)</b>	<b>Total Expenses Requested (at 100%)</b>	<b>CNO Filing Date &amp; Docket No.</b>	<b>Amount of Fees Authorized to be Paid (at 80%)</b>	<b>Amount of Expenses Authorized to be Paid (at 100%)</b>
10/22/2025 [D.I. 356]	August 19, 2025 – September 30, 2025	\$1,355,092.32 <sup>2</sup>	\$15,595.06	11/6/2025 [D.I. 407]	\$1,084,073.86 <sup>3</sup>	\$15,595.06
11/10/2025 [D.I. 419] <sup>4</sup>	October 1, 2025 – October 31, 2025	\$405,906.17	\$3,310.07		\$324,724.94 <i>pending</i>	\$3,310.07 <i>pending</i>
<b>TOTALS</b>		<b>\$1,760,998.49</b>	<b>\$18,905.13</b>		<b>\$1,408,798.80</b> <i>pending</i>	<b>\$18,905.13</b> <i>pending</i>

<sup>2</sup> In Orrick's First Monthly Application (defined herein), Orrick originally requested fees for the period covered in the amount of \$1,429,319.70. For the reasons explained below, Orrick is voluntary reducing its fees under the First Monthly Application by \$74,227.38. Such reduction is reflected in the above prior applications chart and will be reflected in an order approving this Application.

<sup>3</sup> Reflects 80% of the total fees billed less Orrick's voluntary reduction with respect to the First Monthly Application.

<sup>4</sup> Orrick's Second Monthly Application (defined herein), was submitted simultaneously with this Application. Accordingly, the compensation sought in the Second Monthly Application has not yet been approved or paid.

**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)

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

**Hearing Date: December 18, 2025 at 3:00 p.m. (ET)**

**FIRST INTERIM APPLICATION OF  
ORRICK, HERRINGTON & SUTCLIFFE LLP, CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 19, 2025 THROUGH OCTOBER 31, 2025**

Orrick, Herrington & Sutcliffe LLP (“Orrick” or the “Applicant”), 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 *First Interim Application of Orrick, Herrington & Sutcliffe LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from August 19, 2025 through October 31, 2025* (the “Application”) for entry of an order pursuant to section 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 \$1,760,998.49 and reimbursement of expenses in the amount of \$18,905.13 for the period August 19, 2025 through October 31, 2025 (the “Interim Compensation Period”), in support thereof, Orrick respectfully represents as follows:

---

<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.

### **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.

3. The statutory predicates for the relief sought herein are sections 1103 and 331 of the Bankruptcy Code, rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (as amended, the “Local Rules”).

### **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 their property and have continued to operate and manage their 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 as its lead counsel. On August 20, 2025, Morris James LLP 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 their *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].<sup>2</sup>

8. On September 15, 2025, the Committee filed the *Application of the Official Committee of Unsecured Creditors for an Order Authorizing and Approving the Employment and Retention of Orrick, Herrington & Sutcliffe LLP as Counsel, Effective as of August 19, 2025* (the “Retention Application”) [Docket No 192]. On October 1, 2025, the Court entered an order approving the Retention Application, effective as of August 19, 2025 (the “Retention Order”) [Docket No. 255].

### **SERVICES PROVIDED BY ORRICK**

10. Since its retention, Orrick, in its capacity as co-counsel to the Committee, undertook, the following:

- Advised the Committee with respect to its rights, powers and duties in these cases;
- Assisted, advised, and represented the Committee in analyzing the Debtors’ assets and liabilities, including analyzing the claims of the Debtors’ creditors and the Debtors’ capital structure and negotiating with holders of claims and equity interests;
- Assisted and advised the Committee regarding the proposed sale of the Debtors’ assets, including issues concerning any potential competing bidders and the auction process;
- Attended meetings and negotiated with the representatives of the Debtors;

---

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Interim Compensation Order.

- Assisted and advised the Committee in its examination and analysis of the conduct of the Debtors' affairs;
- Assisted the Committee in the review, analysis, and negotiation of the Debtors' proposed chapter 11 plan and assisted the Committee in the review, analysis, and negotiation of the disclosure statements accompanying such plan;
- Investigated and determined the value of the Debtors' unencumbered assets;
- Analyzed and negotiated the budget and monitored the Debtors' financial performance in chapter 11;
- Assisted and advised the Committee with respect to its communications with the general unsecured creditor body regarding significant matters in these cases;
- Reviewed and analyzed the work product of the Debtors' management and advisors and reported to the Committee;
- Took necessary actions to protect and preserve the interests of unsecured creditors, including, without limitation, the prosecution of actions on its behalf, negotiations concerning all litigation in which the Debtors are involved, and review and analysis of all claims filed against the Debtors' estates;
- Prepared and filed on behalf of the Committee all necessary motions, applications, answers, memoranda of law, orders, reports and papers in support of positions taken by the Committee;
- Appeared, as appropriate, in matters heard by this Court to protect the interests of the Committee;
- Reviewed and analyzed discovery documents provided by the Debtors and other parties in interest in connection with the Committee's investigations;
- Performed such other legal services in these cases as were required and deemed to be in the interests of the Committee and unsecured creditors in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code; and
- Advised and assisted with respect to other matters as the Committee may request from time to time, in each case without duplication of the services of Morris James LLP or any other Committee professional.

### **MONTHLY APPLICATIONS**

11. On October 22, 2025, Orrick filed its first monthly application for compensation and reimbursement of expenses [Docket No. 356] (the “First Monthly Application”). By the First Monthly Application, Orrick sought approval of compensation of \$1,429,319.70 and reimbursement of expenses in the amount of \$15,595.06 for the period of August 19, 2025 through September 30, 2025. On November 6, 2025, Orrick filed a certificate of no objection regarding the First Monthly Application [Docket No. 407].

12. On the date hereof, the Orrick attorneys responsible for this matter were informed for the first time that one of the attorneys working on these cases, Andrew Nisco—who is currently a full-time Associate employed directly by Orrick (as of October 8, 2025)—was initially engaged through Orrick’s partnership with legal service provider Legal Innovators at the start date of Orrick’s retention. Under this program, Orrick paid Legal Innovators total fees of \$375,500 for the 2025 calendar year for providing Mr. Nisco through October 7, 2025. During that time, Mr. Nisco billed a total of 1329.40 in billable, revenue-generating hours across all matters on which he was staffed. As such, Orrick calculates Mr. Nisco’s “at cost” rate during this time period as \$282.46 per hour (\$375,500 divided by 1329.40).

13. The nature of Orrick’s arrangement with Legal Innovators and Andrew Nisco was unknown to the Orrick attorneys responsible for this matter at the time that Orrick filed its First Monthly Application. As a result, Mr. Nisco’s hourly rate was incorrectly stated as \$796.50. During the period covered by the First Monthly Application, Mr. Nisco billed a total of 144.4 hours on these cases and Orrick’s First Monthly Application listed his total fees as \$115,014.60 (\$796.50 multiplied by 144.4 hours). However, because Orrick’s “at cost” rate for Andrew Nisco was actually \$282.46 per hour, his total fees should have been stated as \$40,787.22. Therefore, Orrick

is voluntarily reducing its fees due under the First Monthly Application by \$74,227.38 (\$115,014.60 minus \$40,787.22).

14. On November 10, 2025, Orrick filed its second monthly application for compensation and reimbursement of expenses [Docket No. 419] (the “Second Monthly Application,” and together with the First Monthly Application, the “Monthly Applications”). By the Second Monthly Application, Orrick sought approval of compensation of \$405,906.17 and reimbursement of expenses in the amount of \$3,310.07 for the period of October 1, 2025 through October 31, 2025. The deadline to object to the Second Monthly Application is November 24, 2025, at 4:00 p.m. (ET).

15. The total sum due to Orrick for professional services rendered on behalf of the Committee during the Interim Compensation Period is \$1,760,998.49. A chart detailing the fees during, by professional and by category, rendered during the Interim Compensation Period, by each professional and paraprofessional at Orrick are both attached as **Exhibit A**.

16. Orrick submits that the professional services it rendered on behalf of the Committee during this time were both reasonable and necessary.

17. Orrick incurred \$18,905.13 of expenses during the Interim Compensation Period. A chart detailing the specific disbursements is attached hereto as **Exhibit B**.

18. In accordance with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “U.S. Trustee Guidelines”), Orrick has attached the Answers to Questions C.5 of the U.S. Trustee Guidelines, Customary and Comparable Compensation Disclosures and the Budget and Staffing Plan as **Exhibit C**.

19. 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 \$0.10 per page.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, Orrick hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (i) approval of allowance and payment on an interim basis, of Orrick's compensation necessary and valuable professional services rendered to the Committee in the sum of \$1,760,998.49 and reimbursement of expenses in the sum of \$18,905.13 for the period August 19, 2025 through and including October 31, 2025; (ii) payment of any unpaid portion of such fees and expenses (including any unpaid holdback that was withheld from payment under the Monthly Applications); and (iii) such other and further relief as is just and proper.

Dated: November 10, 2025

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

/s/ Mark Franke  
Mark Franke (admitted *pro hac vice*)  
Nicholas Poli (admitted *pro hac vice*)  
Brandon Batzel (admitted *pro hac vice*)  
Ari Roytenberg (admitted *pro hac vice*)  
51 West 52nd Street  
New York, NY 10019-6142  
Telephone: (212) 506-5000  
Facsimile: (212) 506-5151  
E-mail: mfranke@orrick.com  
npoli@orrick.com  
bbatzel@orrick.com  
aroytenberg@orrick.com

-and-

Nick Sabatino (admitted *pro hac vice*)  
400 Capitol Mall, Suite 3000  
Sacramento, CA 95814  
Telephone: (916) 447-9200  
Facsimile: (916) 329-4900  
E-mail: nsabatino@orrick.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.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-11446 (MFW)

(Jointly Administered)

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

**Hearing Date: December 18, 2025 at 3:00 p.m. (ET)**

**NOTICE OF FIRST INTERIM APPLICATION OF  
ORRICK, HERRINGTON & SUTCLIFFE LLP, CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 19, 2025 THROUGH OCTOBER 31, 2025**

**PLEASE TAKE NOTICE** that on November 10, 2025, Orrick, Herrington & Sutcliffe LLP, co-counsel to the Official Committee of Unsecured Creditors appointed in the above-referenced bankruptcy cases (the “Committee”), pursuant to the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 132], filed its first interim fee application (“Application”) seeking allowance of fees in the amount of \$1,760,998.49 and reimbursement of expenses in the amount of \$18,905.13 for the period from August 29, 2025 through October 31, 2025 (the “Interim Compensation Period”) with United States Bankruptcy Court for the District of the Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** 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)**. At the same time, you must also serve a copy of the response upon Committee’s undersigned counsel.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Application will be held on **December 18, 2025 at 3:00 p.m. (ET)** before the Honorable Mary F. Walrath, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5<sup>th</sup> Floor Courtroom No. 4, Wilmington, Delaware 19801.

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

---

<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.

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  
Facsimile: (302) 571-1750  
E-mail: emonzo@morrisjames.com  
scerra@morrisjames.com

-and-

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

Mark Franke (admitted *pro hac vice*)  
Nicholas Poli (admitted *pro hac vice*)  
Brandon Batzel (admitted *pro hac vice*)  
Ari Roytenberg (admitted *pro hac vice*)  
51 West 52nd Street  
New York, NY 10019-6142  
Telephone: (212) 506-5000  
Facsimile: (212) 506-5151  
E-mail: mfranke@orrick.com  
npoli@orrick.com  
bbatzel@orrick.com  
aroytenberg@orrick.com

-and-

Nick Sabatino (admitted *pro hac vice*)  
400 Capitol Mall, Suite 3000  
Sacramento, CA 95814  
Telephone: (916) 447-9200  
Facsimile: (916) 329-4900  
E-mail: nsabatino@orrick.com

*Counsel to the Official Committee of Unsecured  
Creditors*

**EXHIBIT A****Compensation By Category – First Interim Compensation Period**

	<b>First Monthly Application<sup>1</sup></b>		<b>Second Monthly Application</b>		<b>Total</b>	
	<b>Hours</b>	<b>Amount</b>	<b>Hours</b>	<b>Amount</b>	<b>Hours</b>	<b>Amount</b>
Asset Sales	228.80	\$282,108.01	36.40	\$47,546.10	265.2	\$329,654.11
Asset Valuation	0.00	\$0.00	0.00	\$0.00	0	\$0.00
Automatic Stay Issues	0.00	\$0.00	0.50	\$657.00	0.5	\$657.00
Business Operations & Related Motions	19.90	\$25,071.30	0.20	\$262.80	20.1	\$25,334.10
Case Administration	102.00	\$114,962.25	10.00	\$11,747.23	112	\$126,709.48
Case Strategy	104.40	\$133,108.30	53.10	\$65,000.25	157.5	\$198,108.55
Cash Management & Intercompany Issues	0.90	\$1,150.20	0.00	\$0.00	0.9	\$1,150.20
Claims Administration & Objections	0.00	\$0.00	0.00	\$0.00	0	\$0.00
Committee Meetings & Communications	65.70	\$77,551.64	12.00	\$13,771.80	77.7	\$91,323.44
Corporate, Securities and Regulatory Issues	0.00	\$0.00	51.40	\$71,239.05	51.4	\$71,239.05
Creditor Communications	0.10	\$131.40	1.70	\$2,190.60	1.8	\$2,322.00
Executory Contracts & Unexpired Leases	0.00	\$0.00	0.00	\$0.00	0	\$0.00
Exclusivity, Plan & Disclosure Statement	0.50	\$639.00	54.30	\$70,445.70	54.8	\$71,084.70
Financing & Cash Collateral	240.10	\$285,356.20	2.90	\$3,670.20	243	\$289,026.40
Hearings	5.90	\$7,662.60	35.80	\$46,676.25	41.7	\$54,338.85
Investigations – Lenders	317.30	\$274,376.38	31.90	\$31,147.09	349.2	\$305,523.47
Investigations – Non-Lenders	0.40	\$511.20	0.00	\$0.00	0.4	\$511.20

<sup>1</sup> Reflects voluntary reduction of \$74,227.38 and correction of Andrew Nisco's rate and position prior to October 8, 2025.

	First Monthly Application <sup>1</sup>		Second Monthly Application		Total	
	Hours	Amount	Hours	Amount	Hours	Amount
Non-working Travel <sup>2</sup>	2.00	\$1,314.00	0.00	\$0.00	2	\$1,314.00
Other Litigation	161.80	\$124,042.50	15.10	\$10,540.80	176.9	\$134,583.30
Professional Retention & Fee Applications	17.50	\$21,897.00	13.10	\$16,646.40	30.6	\$38,543.40
Reports, Schedules & Statements	0.00	\$0.00	2.20	\$2,829.60	2.2	\$2,829.60
Tax Issues	1.30	\$2,299.05	5.80	\$10,257.30	7.1	\$12,556.35
US Trustee Issues	2.40	\$2,911.29	1.00	\$1,278.00	3.4	\$4,189.29
<b>Total (Discount Applied)</b>	<b>1,271.00</b>	<b>\$1,355,092.32</b>	<b>327.40</b>	<b>\$405,906.17</b>	<b>1,598.40</b>	<b>\$1,760,998.49</b>

---

<sup>2</sup> Non-working travel is billed at one-half hourly rate for attorneys that billed hours to this category.

**Timekeeper Summary – First Interim Compensation Period**

<b>Timekeeper</b>	<b>Position<sup>3</sup></b>	<b>Rate<sup>4</sup></b>	<b>First Monthly Application</b>		<b>Second Monthly Application</b>		<b>Total</b>	
			<b>Hours</b>	<b>Amount</b>	<b>Hours</b>	<b>Amount</b>	<b>Hours</b>	<b>Amount</b>
John Narducci	Partner (joined 2006); Admitted to NY Bar 6/05/1989; Tax	\$1,768.50	1.30	\$2,299.05	5.80	\$10,257.30	7.10	\$12,556.35
Marsha Mogilevich	Partner (joined 2021); Admitted to NY Bar 4/30/2012; Capital Markets	\$1,494.00	0.50	\$747.00	25.50	\$38,097.00	26.00	\$38,844.00
Laura Bagarella	Partner (joined 2024); Admitted to NY Bar 1/21/2010; Compensation and Benefits	\$1,399.50	0.00	\$0.00	3.50	\$4,898.25	3.50	\$4,898.25
Spencer G. Cohen	Partner (joined 2012); Admitted to NY Bar 4/30/2014; M&A and Private Equity	\$1,359.00	0.00	\$0.00	15.30	\$20,792.70	15.30	\$20,792.70
David Litterine-Kaufman	Partner (joined 2016); Admitted to NY Bar 3/26/2008; Restructuring	\$1,386.00	1.10	\$1,524.60	0.00	\$0.00	1.10	\$1,524.60
Nicholas A. Poli	Partner (joined 2023); Admitted to NY Bar 3/12/2015; Financial & Securities Litigation	\$1,341.00	47.30	\$63,429.30	12.00	\$16,092.00	59.30	\$79,521.30
Meredith L. Price Dawson	Partner (joined 2016); Admitted to NY Bar 1/18/2018 and NJ Bar 12/15/2017; Banking & Finance	\$1,323.00	4.60	\$6,085.80	0.00	\$0.00	4.60	\$6,085.80
Mark Franke	Counsel (joined 2023); Admitted to NY Bar 2/26/2014 and MA Bar 7/27/2020; Restructuring	\$1,314.00	161.90	\$212,736.60	67.90	\$89,220.60	229.80	\$301,957.20

<sup>3</sup> Use of contract attorney services is subject to the terms of the Court's Retention Order approving Orrick's retention concerning contract attorneys, and the rates of contract attorneys set forth in this Application reflect the same hourly rate that Orrick pays such contract attorneys.

<sup>4</sup> Rates reflect 10% discount off Orrick's hourly rates.

			First Monthly Application		Second Monthly Application		Total	
Timekeeper	Position <sup>3</sup>	Rate <sup>4</sup>	Hours	Amount	Hours	Amount	Hours	Amount
Brandon Batzel	Senior Associate (joined 2023); Admitted to NY Bar 6/27/2016; Restructuring	\$1,278.00	242.20	\$309,531.60	96.40	\$123,199.20	338.60	\$432,730.80
Ari Roytenberg	Senior Associate (joined 2024); Admitted to New York Bar 9/18/2017; Financial & Securities Litigation	\$1,278.00	122.00	\$155,916.00	12.40	\$15,847.20	134.40	\$171,763.20
Max M. Hyatt	Senior Associate (joined 2019); Admitted to CA Bar 12/2/2016; M&A and Private Equity	\$1,251.00	0.60	\$750.60	19.10	\$23,894.10	19.70	\$24,644.70
Michael Trentin	Senior Associate (joined 2023); Admitted to NY Bar 8/17/2017 and NJ Bar 3/21/2016; Restructuring	\$1,224.00	100.40	\$122,889.60	4.50	\$5,508.00	104.90	\$128,397.60
Nick Sabatino	Senior Associate (joined 2017); Admitted to CA Bar 12/13/2019 and NV Bar 9/16/2021; Restructuring	\$1,201.50	206.30	\$247,869.45	0.40	\$480.60	206.70	\$248,350.05
Jenna M. Busche	Managing Associate (joined 2024); Admitted to NY Bar 1/14/2019; Restructuring	\$1,116.00	123.70	\$138,049.20	39.60	\$44,193.60	163.30	\$182,242.80
Matthew Fechik	Career Associate (joined 2010); Admitted to PA Bar 9/16/2009 and WV Bar 3/07/2018; Restructuring	\$945.00	7.30	\$6,898.50	0.00	\$0.00	7.30	\$6,898.50



Timekeeper	Position <sup>3</sup>	Rate <sup>4</sup>	First Monthly Application		Second Monthly Application		Total	
			Hours	Amount	Hours	Amount	Hours	Amount
Andrew Nisco (On and after 10/8/2025)	Associate (joined 2025); Admitted to DC Bar 12/18/2024; <sup>5</sup> Financial & Securities Litigation	\$895.50 <sup>6</sup>	0.00	\$0.00	8.90	\$7,969.96	8.90	\$7,969.96
Mark Franke – Non-Working Travel	Counsel (joined 2023); Admitted to NY Bar 2/26/14 and MA Bar 7/27/2020; Restructuring	\$657.00	2.0	\$1,314.00	0.00	\$0.00	2.00	\$1,314.00
Cory C. Castillo	Senior Paralegal – Litigation General (joined 2014)	\$544.50	37.20	\$20,255.40	0.00	\$0.00	37.20	\$20,255.40
Lisa N. Huynh	Research Specialist (joined 2025)	\$499.50	1.40	\$699.30	0.00	\$0.00	1.40	\$699.30
Bianca Randall	Research Specialist (joined 2024)	\$499.50	0.40	\$199.80	0.00	\$0.00	0.40	\$199.80
Amy R. Summer	Research Specialist (joined 2024)	\$499.50	0.30	\$149.85	0.00	\$0.00	0.30	\$149.85
Peggy Johnson	Project Attorney (joined 2025); Admitted to IL Bar 12/02/2003; Analytics	\$418.50	9.20	\$3,850.20	5.50	\$2,301.75	14.70	\$6,151.95
Lorenzo V. Lista	Project Attorney (joined 2015); Admitted to PA Bar 5/11/2012; Analytics	\$418.50	2.70	\$1,129.95	0.00	\$0.00	2.70	\$1,129.95
Jarrad Smith	Project Attorney (joined 2021); Admitted to NC Bar 8/28/2009; Analytics	\$418.50	0.00	\$0.00	1.10	\$460.35	1.10	\$460.35
Christian E. Hakim	Project Attorney (joined 2021); Admitted to PA Bar 2/15/2019; Analytics	\$360.00	41.10	\$14,796.00	1.20	\$432.00	42.30	\$15,228.00

<sup>5</sup> Orrick's first monthly fee application [Docket No. 356] mistakenly described Andrew Nisco as "Not Admitted." This was an error. Andrew Nisco's application to the New York Bar is pending but he is already admitted to the DC Bar as of December 18, 2024.

<sup>6</sup> As explained above, on the date hereof, the Orrick attorneys responsible for this matter were informed that Andrew Nisco was employed directly by Orrick as a full-time Associate as of October 8, 2025 and his hourly rate on and after such date reflects the rate that Orrick charges for Associates of his current level of seniority with the 10% discount that Orrick agreed to provide for this representation.

			First Monthly Application		Second Monthly Application		Total	
Timekeeper	Position <sup>3</sup>	Rate <sup>4</sup>	Hours	Amount	Hours	Amount	Hours	Amount
Andrew Nisco <sup>7</sup> (Prior to 10/8/2025)	Orrick Fellow – Contract Attorney (joined 2025); Admitted to DC Bar 12/18/2024; Financial & Securities Litigation	\$282.46 <sup>8</sup>	144.40	\$40,787.22	6.20	\$1,751.26	150.60	\$42,538.48
Will P. Kovalick	Project Support Specialist (joined 2021)	\$243.00	12.90	\$3,134.70	2.10	\$510.30	15.00	\$3,645.00
Johnathon R. Mann	Project Support Specialist (joined 2024)	\$243.00	0.20	\$48.60	0.00	\$0.00	0.20	\$48.60
<b>Total</b>			<b>1,271.00</b>	<b>\$1,355,092.32</b>	<b>327.40</b>	<b>\$405,906.17</b>	<b>1,598.40</b>	<b>\$1,760,998.49</b>

<sup>7</sup> Reflects voluntary reduction of \$74,227.38 and correction of Andrew Nisco's rate and position prior to October 8, 2025.

<sup>8</sup> As explained above, prior to October 8, 2025, Andrew Nisco was engaged through Orrick's partnership with legal service provider Legal Innovators with an "at cost" rate of \$282.46 per hour. As required by the Court's order approving Orrick's retention, Orrick has not charged a markup in this Application with respect to fees billed by Andrew Nisco prior to October 8, 2025 (the start date of Andrew's employment by Orrick as an Associate).

**EXHIBIT B****Summary of Expenses – First Interim Compensation Period**

	<b>First Monthly Application</b>	<b>Second Monthly Application</b>	<b>Total</b>
Deposition binders	\$0.00	\$1,924.00	\$1,924.00
Deposition transcripts	\$14,261.85	\$561.42	\$14,823.27
Business meals	\$521.15	\$81.33	\$602.48
Airfare	\$495.97	\$0.00	\$495.97
Taxis	\$256.09	\$327.92	\$584.01
E-Discovery Vendor	\$0.00	\$297.00	\$297.00
PACER/CourtDrive	\$0.00	\$118.40	\$118.40
Internet, wifi	\$60.00	\$0.00	\$60.00
<b>TOTAL:</b>	<b>\$15,595.06</b>	<b>\$3,310.07</b>	<b>\$18,905.13</b>

**EXHIBIT C**

**EXHIBIT C-1****BUDGET**

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS</b>	<b>ESTIMATED FEES</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
Asset Sales	260.8	\$300,000.00	265.2	\$329,654.11
Asset Valuation	0.0	\$0.00	0	\$0.00
Automatic Stay Issues	0.0	\$0.00	0.5	\$657.00
Business Operations & Related Motions	21.7	\$25,000.00	20.1	\$25,334.10
Case Administration	86.9	\$100,000.00	112	\$126,709.48
Case Strategy	173.9	\$200,000.00	157.5	\$198,108.55
Cash Management & Intercompany Issues	0.0	\$0.00	0.9	\$1,150.20
Claims Administration & Objections	0.0	\$0.00	0	\$0.00
Committee Meetings & Communications	65.2	\$75,000.00	77.7	\$91,323.44
Corporate, Securities and Regulatory Issues	65.2	\$75,000.00	51.4	\$71,239.05
Creditor Communications	4.3	\$5,000.00	1.8	\$2,322.00
Executory Contracts & Unexpired Leases	0.0	\$0.00	0	\$0.00
Exclusivity, Plan & Disclosure Statement	86.9	\$100,000.00	54.8	\$71,084.70
Financing & Cash Collateral	260.8	\$300,000.00	243	\$289,026.40
Hearings	43.5	\$50,000.00	41.7	\$54,338.85
Investigations – Lenders	260.8	\$300,000.00	349.2	\$305,523.47
Investigations – Non-Lenders	0.0	\$0.00	0.4	\$511.20
Non-working Travel <sup>1</sup>	4.3	\$5,000.00	2	\$1,314.00
Other Litigation	86.9	\$100,000.00	176.9	\$134,583.30
Professional Retention & Fee Applications	39.1	\$45,000.00	30.6	\$38,543.40

---

<sup>1</sup> Non-working travel is billed at one-half hourly rate for attorneys that billed hours to this category.

Reports, Schedules & Statements	4.3	\$5,000.00	2.2	\$2,829.60
Tax Issues	8.7	\$10,000.00	7.1	\$12,556.35
US Trustee Issues	4.3	\$5,000.00	3.4	\$4,189.29
<b>TOTAL</b>	<b>1,478.10</b>	<b>\$1,700,000.00</b>	<b>1,598.40</b>	<b>\$1,760,998.49</b>

**EXHIBIT C-2****STAFFING PLAN**

<b>CATEGORY OF TIMEKEEPER</b>	<b>NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE BUDGET PERIOD</b>	<b>NUMBER OF TIMEKEEPERS ACTUALLY WORKED ON THE MATTER DURING THE BUDGET PERIOD</b>	<b>AVERAGE HOURLY RATE<sup>2</sup></b>
Partner	6	7	\$1,438.71
Counsel	1	1	\$1,314.00
Associate	10	12	\$900.38
Paraprofessional	3	6	\$420.50
Contract Attorney	0	1	\$282.46
<b>Total</b>	<b>19</b>	<b>27</b>	<b>\$925.96</b>

---

<sup>2</sup> Average hourly rates calculated by *adding all applicable timekeepers' individual hourly rates* as of the end of the Interim Compensation Period and dividing this sum by the *total number of applicable timekeepers that billed hours* during the Interim Compensation Period (reflects Orrick professionals' and paraprofessionals' hourly rates discounted by 10% but ignoring the one-half hourly rate used for non-working travel).

**EXHIBIT C-3****CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

<b>Category of Timekeeper</b>	<b>Blended hourly<sup>3</sup> in comparable practice areas<sup>4</sup></b>	<b>Blended hourly Firm-wide<sup>5</sup></b>	<b>Interim Compensation Period Blended Rate<sup>6</sup></b>
Partner	\$1,660.00	\$1,665.00	\$1,404.82
Counsel	\$1,400.00	\$1,425.00	\$1,308.33
Associate	\$1,155.00	\$1,145.00	\$1,173.62
Contract Attorney <sup>7</sup>	\$565.00	\$565.00	\$282.46
Paraprofessional	\$500.00	\$500.00	\$458.68
<b>Total</b>	<b>\$1,260.00</b>	<b>\$1,145.00</b>	<b>\$1,101.73</b>

<sup>3</sup> Consistent with ¶ C.3 of the U.S. Trustee Guidelines, the blended hourly rates set forth herein are calculated by dividing the dollar value of hours billed by the number of hours billed for the relevant timekeepers during the applicable time period.

<sup>4</sup> Orrick's hourly rates for bankruptcy services are comparable or less than the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Orrick's hourly rates for bankruptcy services are comparable to the rates charged by the firm, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required.

<sup>5</sup> This column reflects the blended hourly rates charged by the firm for the services performed in all practice areas and excludes Orrick's restructuring group.

<sup>6</sup> Blended rate calculated by dividing the *total dollar amount* billed by applicable timekeepers during the Interim Compensation Period by the *total number of hours billed* by such timekeepers during the Interim Compensation Period (reflects Orrick professionals' and paraprofessionals' hourly rates discounted by 10% and one-half hourly rate used for non-working travel).

<sup>7</sup> The rates shown for Orrick's blended hourly rates for contract attorneys in comparable practice areas and firm-wide reflect markups that Orrick typically will charge in matters that do not involve Orrick's engagement by official committees, debtors, or other estate fiduciaries pursuant to the requirements of the Bankruptcy Code and the Bankruptcy Rules. For the avoidance of doubt, Orrick will not charge a markup for the use of any contract attorneys in these case as set forth in the Retention Order.

## ANSWERS TO QUESTIONS SET FORTH IN ¶ C.5 OF THE U.S. TRUSTEE GUIDELINES

<u>Question</u>	<u>Answer</u>
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	Yes. Orrick provided a 10% discount off of its hourly rates to the Committee for all Orrick attorneys and paraprofessionals in this matter; <i>provided</i> , that the Committee may, in its discretion, elect to waive this discount in connection with Orrick's final fee application.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	The fees sought in this Application are not more than 10% higher than the amount budgeted for the Interim Compensation Period.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	Except in connection with making reasonable efforts to comply with the U.S. Trustee Guidelines, this Application does not include time spent reviewing invoices.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No.
<p>If the fee application includes any rate increases since retention:</p> <p>Did your client review and approve those rate increases in advance?</p> <p>Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?</p>	The hourly rates of Orrick associates and paraprofessionals vary by level of seniority, and those hourly rates based on seniority are subject to annual increase, which the Committee agreed to in connection with Orrick's Retention Application. Orrick has not increased hourly rates based on level of senior since Orrick's retention. Orrick did not request that the client accept all future rate increases.



**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)

**DECLARATION OF MARK FRANKE IN SUPPORT OF  
FIRST INTERIM APPLICATION OF ORRICK, HERRINGTON & SUTCLIFFE LLP,  
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 19, 2025 THROUGH OCTOBER 31, 2025**

I, Mark Franke, after being sworn according to law, deposes and says:

1. I am Of Counsel at the firm Orrick, Herrington & Sutcliffe LLP (“Orrick”), co-counsel to the Official Committee of Unsecured Creditors (the “Committee”).

2. I have read the foregoing *First Interim Application of Orrick, Herrington & Sutcliffe LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from August 19, 2025 through October 31, 2025* and know the contents thereof. The same contents are true to the best of my knowledge, except as to matters therein alleged to be upon information and belief, and as to those matters, I believe them to be true. I have personally performed many of the legal services rendered by Orrick and am thoroughly familiar with all other work performed on behalf of the Committee by the attorneys and paraprofessionals at Orrick.

3. On the date hereof, I was informed for the first time that one of the attorneys working on these cases, Andrew Nisco—who is currently a full-time Associate employed directly

---

<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.

by Orrick (as of October 8, 2025)—was initially engaged through Orrick’s partnership with legal service provider Legal Innovators at the start date of Orrick’s retention. Under this program, Orrick paid Legal Innovators total fees of \$375,500 for the 2025 calendar year for providing Mr. Nisco through October 7, 2025. During that time, Mr. Nisco billed a total of 1329.40 in billable, revenue-generating hours across all matters on which he was staffed. As such, Orrick calculates Mr. Nisco’s “at cost” rate during this time period as \$282.46 per hour (\$375,500 divided by 1329.40).

4. The nature of Orrick’s arrangement with Legal Innovators and Andrew Nisco was unknown to me at the time that Orrick filed its First Monthly Application. As a result, Andrew’s hourly rate was incorrectly stated as \$796.50. During the period covered by the First Monthly Application, Mr. Nisco billed a total of 144.4 hours on these cases and Orrick’s First Monthly Application listed his total fees as \$115,014.60 (\$796.50 multiplied by 144.4 hours). However, because Orrick’s “at cost” rate for Andrew Nisco was actually \$282.46 per hour, his total fees should have been stated as \$40,787.22. Therefore, Orrick is voluntarily reducing the unpaid portion of its fees due under the First Monthly Application by \$74,227.38 (\$115,014.60 minus \$40,787.22).

5. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between Orrick and any other person for the sharing of compensation to be received in connection with the above-captioned cases.

6. I have reviewed the requirements of Local Rule 2016-1 and to the best of my knowledge, information, and belief, this Application complies with Local Rule 2016-1.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: November 10, 2025

/s/ Mark Franke  
Mark Franke (admitted *pro hac vice*)

**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)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> 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 *First Interim Application of Orrick, Herrington & Sutcliffe LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 19, 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)

---

<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.

**Service List**

AGDP Holdings INC.  
Attn: General Counsel  
140 Stewart Ave  
Brooklyn, NY 11237

*Debtors*

Sean M. Beach, Esq.  
S. Alexander Faris, Esq.  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
sbeach@ycst.com  
afaris@ycst.com

*Counsel to the Debtors*

Joshua M. Spencer, Esq.  
Alter Domus (US) LLC  
Facility, Holland & Knight LLP  
150 N. Riverside Plaza, Suite 2700  
Chicago, IL 60606  
joshua.spencer@hklaw.com

*Administrative agent and collateral agent  
under the Prepetition Financing Agreement  
and the DIP*

Adam Harris, Esq.  
McDermott, Will & Schulte, LLP  
919 Third Avenue  
New York, NY 10022  
adam.harris@srz.com

*Counsel to the DIP Lenders and Prepetition  
Term Loan Lender*

Thomas R. Sloane, Esq.  
333 Earle Ovington  
Boulevard, 2nd Floor  
Uniondale, NY 11553  
tslome@cullenllp.com

*Counsel to LiveStyle*

Jonathan W. Lipshie, Esq.  
Office of the United States Trustee  
for the District of Delaware  
J. Caleb Boggs Building  
844 King Street  
Suite 2207, Lockbox 35  
Wilmington, Delaware 19801  
Jon.Lipshie@usdoj.gov

*United States Trustee*