

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 MORRIS JAMES LLP,  
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 20, 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>August 20, 2025 through October 31, 2025</u>
Compensation sought as actual, reasonable, and necessary:	<u>\$223,865.50</u>
Expense reimbursement sought as actual, reasonable, and necessary:	<u>\$880.65</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.



## Previous Applications:

<b>Monthly Fee Application Filing Date &amp; Docket No.</b>	<b>Period Covered</b>	<b>Total Fees Requested</b>	<b>Total Expenses Requested</b>	<b>CNO Filing Date &amp; Docket No.</b>	<b>Amount of Fees Authorized to be Paid</b>	<b>Amount of Expenses Authorized to be Paid</b>
10/22/2025 [D.I. 357]	August 20, 2025 – September 30, 2025	\$144,093.50	\$693.02	11/6/2025 [D.I. 409]	\$115,274.80	\$693.02
11/6/2025 [D.I. ]	October 1, 2025 – October 31, 2025	\$79,772.00	\$187.63		<i>pending</i>	<i>pending</i>
<b>TOTALS</b>		<b>\$223,865.50</b>	<b>\$880.65</b>		<b>\$115,274.80</b>	<b>\$693.02</b>

**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)**

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**FIRST INTERIM 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 AUGUST 20, 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 *First Interim 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 August 20, 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 \$223,865.50 and reimbursement of expenses in the amount of \$880.65 for the period August 20, 2025 through October 31, 2025 (the “Interim Compensation Period”), in support thereof, Morris James respectfully represents as follows:

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<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 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].

### **SERVICES PROVIDED BY MORRIS JAMES**

9. Since its retention, Morris James, in its capacity as co-counsel to the Committee, undertook, the following:

- Provided legal advice and assistance to the Committee in its consultation with the Debtors relative to the Debtors’ administration of its reorganization and the Chapter 11 Cases;
- Reviewed and analyzed all applications, motions, orders, statements of operations, and schedules filed with the Court by the Debtors or third parties, advised the Committee as to their propriety, and after consultation with the Committee, took appropriate action;
- Prepared necessary applications, motions, responses, answers, orders, reports, and other legal papers on behalf of the Committee;
- Represented the Committee at hearings held before the Court and communicated with the Committee regarding the issues raised, as well as the decisions of the Court; and
- Performed such other legal services to the Committee in connection with the prosecution of the Chapter 11 Cases as are necessary and appropriate.

### **MONTHLY APPLICATIONS**

10. On October 22, 2025, Morris James filed its first monthly application for compensation and reimbursement of expenses [Docket No. 357] (the “First Monthly Application”). By the First Monthly Application, Morris James sought approval of compensation of \$144,093.50 and reimbursement of expenses in the amount of \$693.02 for the period of August 20, 2025 through September 30, 2025. On November 6, 2025, Morris James filed a certificate of no objection regarding the First Monthly Application [Docket No. 409].

11. On November 10, 2025, Morris James filed its second monthly application for compensation and reimbursement of expenses [Docket No. ] (the “Second Monthly Application”). By the Second Monthly Application, Morris James sought approval of compensation of \$79,772.00 and reimbursement of expenses in the amount of \$187.63 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).

12. The total sum due to Morris James for professional services rendered on behalf of the Committee during the Interim Compensation Period is \$223,865.50. A chart detailing the fees during, by professional and by category rendered during the Interim Compensation Period, by each professional and paraprofessional at Morris James are both attached as **Exhibit A**.

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

14. Morris James incurred \$880.65 of expenses during the Interim Compensation Period. A chart detailing the specific disbursements is attached hereto as **Exhibit B**.

15. In accordance with the United States Trustee Large Case Fee Guidelines (“Fee Guidelines”), Morris James has attached the Answers to Questions C.5 of the Fee

Guidelines, Customary and Comparable Compensation Disclosures and the Budget and Staffing Plan as **Exhibit C**.

16. 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.

WHEREFORE, Morris James hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (i) approval of allowance and payment on an interim basis, of Morris James' compensation necessary and valuable professional services rendered to the Committee in the sum of \$223,865.50 and reimbursement of expenses in the sum of \$880.65 for the period August 20, 2025 through and including October 31, 2025; (ii) payment of any 20% holdback that was withheld from payment under the monthly fee application; and (iii) such other and further relief as is just and proper.

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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*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)

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**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 MORRIS JAMES LLP,  
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 20, 2025 THROUGH OCTOBER 31, 2025**

**PLEASE TAKE NOTICE** that on November 10, 2025, Morris James 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 \$223,865.50 and reimbursement of expenses in the amount of \$880.65 for the period from August 20, 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 20% HOLDBACK, MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.**

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<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  
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scerra@morrisjames.com

-and-

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

Mark Franke (admitted *pro hac vice*)  
Nicholas Poli (admitted *pro hac vice*)  
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*Counsel to the Official Committee of Unsecured  
Creditors*

# **EXHIBIT A**

## **Compensation By Category – First Interim Compensation Period**

	<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>
B110 Case Administration	47.40	\$32,029.00	27.80	\$18,403.00	<b>75.20</b>	<b>\$50,432.00</b>
B130 Asset Disposition	3.10	\$2,756.00	4.10	\$3,128.50	<b>7.20</b>	<b>\$5,884.50</b>
B140 Relief from Stay/Adequate Protection Proceedings	-	-	0.40	\$362.00	<b>0.40</b>	<b>\$362.00</b>
B150 Meetings/Communications with Committee and/or Creditors	25.00	\$20,074.00	11.70	\$9,073.50	<b>36.70</b>	<b>\$29,147.50</b>
B160 Retention Applications (MJ)	11.60	\$5,307.00	0.10	\$90.50	<b>11.70</b>	<b>\$5,397.50</b>
B165 Retention Applications (Others)	19.20	\$12,056.50	0.40	\$258.00	<b>19.60</b>	<b>\$12,314.50</b>
B170 Fee Applications (MJ)	1.20	\$462.00	5.90	\$2,887.00	<b>7.10</b>	<b>\$3,349.00</b>
B175 Fee Applications (Others)	0.10	\$42.50	14.00	\$10,226.50	<b>14.10</b>	<b>\$10,269.00</b>
B185 Assumption/Rejection of Leases and Contracts	1.10	\$551.50	0.70	\$585.50	<b>1.80</b>	<b>\$1,137.00</b>
B190 Other Contested Matters (excluding assumption/rejection motions)	80.50	\$57,765.00	27.60	\$20,509.00	<b>108.10</b>	<b>\$78,274.00</b>
B196 Litigation	0.30	\$127.50	-	-	<b>0.30</b>	<b>\$127.50</b>
B220 Employee Benefits/Pensions	-	-	0.60	\$543.00	<b>0.60</b>	<b>\$543.00</b>
B230 Financing/Cash Collateral	13.90	\$10,395.00	7.40	\$5,735.00	<b>21.30</b>	<b>\$16,130.00</b>
B310 Claims Administration and Objections	-	-	0.50	\$452.50	<b>0.50</b>	<b>\$452.50</b>
B320 Plan and Disclosure Statement	3.40	\$2,527.50	3.00	\$2,475.00	<b>6.40</b>	<b>\$5,002.50</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>
B430A Court Hearings: Attendance and Preparation	-	-	5.70	\$5,043.00	<b>5.70</b>	<b>\$5,043.00</b>
<b>Total</b>	<b>206.60</b>	<b>\$144,093.50</b>	<b>109.90</b>	<b>\$79,772.00</b>	<b>316.70</b>	<b>\$223,865.50</b>

**Timekeeper Summary – First Interim Compensation Period**

		<b>First Monthly Application</b>		<b>Second Monthly Application</b>		<b>Total</b>	
<b>Timekeeper</b>	<b>Position</b>	<b>Hours</b>	<b>Amount</b>	<b>Hours</b>	<b>Amount</b>	<b>Hours</b>	<b>Amount</b>
Eric J. Monzo	Member of the Delaware Bar since 2008; Partner in Bankruptcy Department since 2014	38.30	\$34,661.50	32.40	\$29,322.00	<b>70.70</b>	<b>\$63,983.50</b>
Brya M. Keilson	Member of the Delaware Bar since 2005; Partner in Bankruptcy Department since 2019	91.90	\$78,115.00	42.10	\$35,785.00	<b>134.00</b>	<b>\$113,900.00</b>
Jason S. Levin	Member of the Delaware Bar since 2017; Associate in Bankruptcy Department since 2020	8.00	\$4,200.00	4.80	\$2,520.00	<b>12.80</b>	<b>\$6,720.00</b>
Siena B. Cerra	Member of the Delaware Bar since 2023; Associate in Bankruptcy Department since 2023	17.20	\$7,310.00	9.10	\$3,867.50	<b>26.30</b>	<b>\$11,177.50</b>
Samantha L. Rodriguez	Member of the Delaware Bar since 2025; Associate in Bankruptcy Department since 2025	1.20	\$480.00	-	-	<b>1.20</b>	<b>\$480.00</b>
Stephanie A. Lisko	Paralegal in Bankruptcy Department since 2020	23.60	\$9,086.00	5.70	\$2,194.50	<b>29.30</b>	<b>\$11,280.50</b>
Douglas J. Depta	Paralegal in Bankruptcy Department since 2020	26.20	\$10,087.00	10.80	\$4,158.00	<b>37.00</b>	<b>\$14,245.00</b>
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2025	0.40	\$154.00	5.00	\$1,925.00	<b>5.40</b>	<b>\$2,079.00</b>
<b>Total</b>		<b>206.80</b>	<b>\$144,093.50</b>	<b>109.90</b>	<b>\$79,772.00</b>	<b>316.70</b>	<b>\$223,865.50</b>

## **EXHIBIT B**

### **Summary of Expenses – First Interim Compensation Period**

	<b>First Monthly Application</b>	<b>Second Monthly Application</b>	<b>Total</b>
Postage	\$90.22	\$40.53	\$130.75
Reproduction	\$283.20	\$40.40	\$323.60
USDC Fees (PHV)	\$250.00	-	\$250.00
Reliable (Transcript)	\$69.60	-	\$69.60
Westlaw	-	\$30.23	\$30.23
Pacer	-	\$57.50	\$57.50
Innovative Driven	-	\$18.97	\$18.97
<b>TOTAL:</b>	<b>\$693.02</b>	<b>\$187.63</b>	<b>\$880.65</b>

# **EXHIBIT C**

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

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS</b>	<b>ESTIMATED FEES</b>
Asset Analysis and Recovery		
Asset Disposition	25	\$15,000
Assumption and Rejection of Leases and Contracts	5	\$2,500
Avoidance Action Analysis		
Budgeting (Case)		
Business Operations		
Case Administration	90	\$60,000
Claims Administration and Objections	5	\$2,500
Corporate Governance and Board Matters		
Court Hearings: Attendance and Preparation	10	\$10,000
Employee Benefits and Pensions	5	\$2,500
Employment and Fee Applications	60	\$35,000
Employment and Fee Application Objections		
Financing and Cash Collateral	25	\$20,000
Litigation		
Meetings and Communications with Creditors	50	\$40,000
Non-Working Travel		
Other Contested Matters (excluding assumption/rejection motions)	125	\$100,000
Plan and Disclosure Statement	20	\$10,000
Real Estate		
Relief from Stay and Adequate Protection	5	\$2,500
Reporting		
Tax		
Valuation		
<b>TOTAL</b>	<b>425</b>	<b>\$300,000</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>AVERAGE HOURLY RATE</b>
Sr./Equity Partner/Shareholder	2	\$877.50
Jr./Non-equity/Income Partner		
Counsel		
Sr. Associate (7 or more years since first admission)	1	\$525.00
Associate (4-6 years since first admission)		
Jr. Associate (1- 3 years since first admission)	2	\$412.50
Staff Attorney		
Contract Attorney		
Paralegal	3	\$385.00
Law Clerk		
Case Manager		



## ANSWERS TO QUESTIONS SET FORTH IN ¶ C.5 OF THE APPX. B 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.	No.
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?	No.
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.	No.
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>	No.

## CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

Morris James' 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, Morris James' 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.

Category of Timekeeper (as maintained by the Firm)	<u>Blended Hourly Rate<sup>1</sup></u>		
	Billed firm-wide other than for bankruptcy and personal injury for November 1, 2024 through October 31, 2025 <sup>2</sup>	Billed for Morris James' National Practices other than bankruptcy only for November 1, 2024 through October 31, 2025 <sup>3</sup>	Billed Through Interim Period
Partner	\$785.45	\$866.89	\$869.00
Associate <sup>4</sup>	\$431.63	\$467.06	\$456.02
Paralegal	\$286.84	\$320.69	\$385.00
<b>Aggregate:</b>	<b>\$589.39</b>	<b>\$686.15</b>	<b>\$707.32</b>

<sup>1</sup> Consistent with ¶ C.3 of the Appendix B 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. The data for the "preceding year" is based on information from Morris James' financial information for the period of November 1, 2024 through October 31, 2025.

<sup>2</sup> Please note that this column does not include the rates of the firm's personal injury attorneys, each of whom bill on a contingency basis.

<sup>3</sup> This column does not include Morris James' "local practices" (e.g., labor law, matrimonial, medical malpractice, real estate, and tax and estates).

<sup>4</sup> The "associate" category of timekeepers also includes senior counsel.

**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 ERIC J. MONZO IN SUPPOPT OF FIRST INTERIM  
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 AUGUST 20, 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:

1. I am a partner at the firm of Morris James LLP (“Morris James”), co-counsel to the Official Committee of Unsecured Creditors (the “Committee”).

2. I have read the foregoing *First Interim 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 August 20, 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 Morris James and

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<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.

am thoroughly familiar with all other work performed on behalf of the Committee by the attorneys and paraprofessionals in Morris James.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and Section 504 of the Title 11, United States Code, no agreement or understanding exists between Morris James and any other person for the sharing of compensation to be received in connection with the above-captioned case.

4. I have reviewed the requirements of Local Rule 2016-1 of the United States Bankruptcy Court for the District of Delaware, 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/ Eric J. Monzo  
Eric J. Monzo (DE Bar No. 5214)

**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 Morris James LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 20, 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 completed 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)

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<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**

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and the DIP*

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*United States Trustee*