

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>IslandDundon LLC</u>
Authorized to provide professional services to:	Official Committee of Unsecured Creditors of <u>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>\$503,287.00</u>
Expense reimbursement sought as actual, reasonable, and necessary:	<u>\$139.68</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>
10/10/2025 [D.I. 296]	August 20, 2025 – September 30, 2025	\$325,203.50	\$139.68	10/27/2025 [D.I. 374]	\$260,162.80	\$139.68
11/10/2025 [D.I. 421]	October 1, 2025 – October 31, 2025	\$178,083.50	\$0.00		<i>pending</i>	<i>pending</i>
<b>TOTALS</b>		<b>\$503,287.00</b>	<b>\$139.68</b>		<b>\$260,162.80</b>	<b>\$139.68</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)**  
**Hearing Date: December 18, 2025 at 3:00 p.m. (ET)**

**FIRST INTERIM APPLICATION OF ISLANDDUNDON LLC,  
FINANCIAL ADVISOR 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**

IslandDundon LLC (“IslandDundon”), financial advisor 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 IslandDundon LLC, Financial Advisor 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 \$503,287.00 and reimbursement of expenses in the amount of \$139.68 for the period August 20, 2025 through October 31, 2025 (the “Interim Compensation Period”), in support thereof, IslandDundon 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 IslandDundon LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of August 20, 2025* (the “Retention Application”) [Docket No 195]. On October 1, 2025, the Court entered an order approving the Retention Application, effective as of August 20, 2025 [Docket No. 258].

### **SERVICES PROVIDED BY ISLANDDUNDON**

10. Since its retention, IslandDundon, in its capacity as financial advisor to the Committee, undertook, the following:

- Developed an understanding of the Debtors’ business and their valuations;
- Determined whether there were viable alternative paths for the disposition of the Debtors’ assets from those initially proposed by the Debtors.
- Advised the Committee in negotiations with the Debtors and/or the Debtors’ lenders.
- Analyzed the Debtors’ budgets, budget-to-actual variances, and liquidity.
- Analyzed the Debtors’ filed SOFAs, SOALS, and monthly operating reports.
- Attended and presented at Committee meetings as well as meetings with the Debtors and their advisors.
- Performed other financial advisory services to the Committee as were necessary and appropriate as detailed in the Retention Application.

### **MONTHLY APPLICATIONS**

11. On October 10, 2025, IslandDundon filed its first monthly application for compensation and reimbursement of expenses [Docket No. 296] (the “First Monthly Application”). By the First Monthly Application, IslandDundon sought approval of compensation of \$325,203.50 and reimbursement of expenses in the amount of \$139.68 for the period of August 20, 2025 through September 30, 2025. On October 27, 2025, IslandDundon filed a certificate of no objection regarding the First Monthly Application [Docket No. 374].

12. On November 10, 2025, IslandDundon filed its second monthly application for compensation and reimbursement of expenses [Docket No. 421] (the “Second Monthly Application”). By the Second Monthly Application, IslandDundon sought approval of compensation of \$178,083.50 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).

13. The total sum due to IslandDundon for professional services rendered on behalf of the Committee during the Interim Compensation Period is \$503,287.00. A chart detailing the fees during, by professional and by project category rendered during the Interim Compensation Period, by each professional at IslandDundon are both attached as **Exhibit A**.

14. A detailed chronological itemization of services rendered by each professional during the Interim Compensation Period, calculated by tenths of an hour and categorized in accordance with the appropriate project categories, are attached to the previously filed monthly fee applications [Docket Nos. 296; ].

15. Every effort has been made by IslandDundon to categorize daily time entries in accordance with the correct project category. However, in some instances, services overlap

between project category. Thus, some services may appear under more than one category, although in no instance is a specific time entry recorded more than once.

16. The total number of hours expended by IslandDundon professionals in performing professional services for the Committee during the Interim Compensation Period was 658.40 hours at a blended billing rate of \$764.41 per hour. The value of these services has been computed at the rates Dundon customarily charges for similar services provided to other clients.

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

18. IslandDundon incurred \$139.68 of expenses during the Interim Compensation Period. A chart detailing the specific disbursements is attached hereto as **Exhibit B**.

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.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, IslandDundon hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (i) approval of allowance and payment on an interim basis, of IslandDundon's compensation necessary and valuable professional services rendered to the Committee in the sum of \$503,287.00 and reimbursement of expenses in the sum of \$139.68 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

**ISLANDDUNDON LLC**

/s/ Peter Hurwitz

Peter Hurwitz

10 Bank Street, Suite 1100

White Plains, NY 10606

Telephone: (914) 341-1188

E-mail: ph@dundon.com

*Financial Advisor 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 ISLANDDUNDON LLC,  
FINANCIAL ADVISOR 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, IslandDundon LLC, financial advisor 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 \$503,287.00 and reimbursement of expenses in the amount of \$139.68 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

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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 Project Category – First Interim Compensation Period**

Project Category	First Monthly Application		Second Monthly Application		Total	
	<u>Billable Time</u>	<u>Billable Amount</u>	<u>Billable Time</u>	<u>Billable Amount</u>	<u>Billable Time</u>	<u>Billable Amount</u>
Business Analysis	236.90	\$182,133.00	181.20	\$128,077.50	418.10	\$310,210.50
Committee Member/Professional Meetings & Communications	67.10	\$59,223.50	11.40	\$10,519.00	78.50	\$69,742.50
Sales Process	60.50	\$47,656.50	6.30	\$5,746.00	66.80	\$53,402.50
Debtor Professional and Client Meeting	21.80	\$16,441.00	0.90	\$673.00	22.70	\$17,114.00
Retention and Fee Applications	13.80	\$9,976.00	8.90	\$6,357.00	22.70	\$16,333.00
Claims Analysis	0.60	\$483.00	16.20	\$11,748.00	16.80	\$12,231.00
Case Administration	13.50	\$8,575.50	5.60	\$3,100.00	19.10	\$11,675.50
Plan and Disclosure Statement	0.10	\$65.00	7.10	\$6,583.00	7.20	\$6,648.00
Investigations	0.00	\$0.00	4.00	\$3,840.00	4.00	\$3,840.00
Other Professionals' Retention and Fee Applications	1.00	\$650.00	1.50	\$1,440.00	2.50	\$2,090.00
<b>Grand Total</b>	<b>415.30</b>	<b>\$325,203.50</b>	<b>243.10</b>	<b>\$178,083.50</b>	<b>658.40</b>	<b>\$503,287.00</b>

**Professional Summary – First Interim Compensation Period**

<u>Professional</u>	<u>Title</u>	<u>Hourly Billing Rate</u>	<u>First Monthly Application</u>		<u>Second Monthly Application</u>		<u>Total</u>	
			<u>Total Billed Hours</u>	<u>Total Fees</u>	<u>Total Billed Hours</u>	<u>Total Fees</u>	<u>Total Billed Hours</u>	<u>Total Fees</u>
Peter Hurwitz	Principal	\$1,090.00	62.70	\$68,343.00	23.00	\$25,070.00	85.70	\$93,413.00
Steven Landgraber	Managing Director	\$960.00	26.80	\$25,200.00	1.00	\$960.00	27.80	\$26,160.00
Joshua Nahas	Managing Director	\$960.00	101.80	\$97,728.00	64.50	\$61,920.00	166.30	\$159,648.00
Scott Woods	Senior Director	\$850.00	29.30	\$24,437.50	1.00	\$850.00	30.30	\$25,287.50
Christopher Podesfinski	Associate Director	\$650.00	118.50	\$77,025.00	97.00	\$63,050.00	215.50	\$140,075.00
Irene Byun	Senior Associate	\$495.00	40.00	\$19,800.00	42.30	\$20,938.50	82.30	\$40,738.50
Eric Markes	Senior Associate	\$495.00	0.00	\$0.00	2.00	\$990.00	2.00	\$990.00
Ty Chung	Associate	\$350.00	36.20	\$12,670.00	12.30	\$4,305.00	48.50	\$16,975.00
<b>Total</b>			<b>415.30</b>	<b>\$325,203.50</b>	<b>243.10</b>	<b>\$178,083.50</b>	<b>658.40</b>	<b>\$503,287.00</b>

Notes:

- 1) *In the first monthly fee application, 1.1 hours of non-working travel time for Steven Landgraber was billed at 50% of his hourly rate and included under “Case Administration” category.*
- 2) *In the first monthly fee application, 1.1 hours of non-working travel time for Scott Woods was billed at 50% of his hourly rate and included under the “Case Administration” category.*
- 3) *Blended Hourly Rate: \$764.41*

## **EXHIBIT B**

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

<u>Expense</u>	<u>First Monthly Application</u>	<u>Second Monthly Application</u>	<u>Total</u>
	<b>Amount</b>	<b>Amount</b>	<b>Amount</b>
Transportation	\$139.68	0.00	\$139.68
<b>Total</b>	<b>\$139.68</b>	<b>0.00</b>	<b>\$139.68</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)

**DECLARATION OF PETER HURWITZ IN SUPPORT OF FIRST INTERIM  
APPLICATION OF ISLANDDUNDON LLC, FINANCIAL ADVISOR 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**

I, Peter Hurwitz, after being sworn according to law, deposes and says:

1. I am a principle at the firm of IslandDundon LLC (“IslandDundon”), financial advisor to the Official Committee of Unsecured Creditors (the “Committee”).

2. I have read the foregoing *First Interim Application of IslandDundon LLC, Financial Advisor 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 services rendered by IslandDundon and am thoroughly familiar with all other work performed on behalf of the Committee by the professionals at IslandDundon.

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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.

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 IslandDundon 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/ Peter Hurwitz  
Peter Hurwitz

**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 IslandDundon LLC, Financial Advisor 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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**Service List**

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