

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)

**AFFIDAVIT OF PUBLICATION OF THE NOTICE OF HEARING TO CONSIDER
FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION
OF THE DEBTORS' CHAPTER 11 PLAN AND RELATED VOTING AND
OBJECTION DEADLINES IN THE NEW YORK TIMES**

This Affidavit of Publication includes the sworn statement verifying that the *Notice of Hearing to Consider Final Approval of the Disclosure Statement and Confirmation of the Debtors' Chapter 11 Plan and Related Voting and Objection Deadlines* was published, incorporated by reference herein, as follows:

1. In *The New York Times* on November 10, 2025, attached hereto as **Exhibit A**.

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.



251144625111400000000003

Exhibit A



The New York Times
Company

620 8th Avenue
New York, NY 10018
nytimes.com

PROOF OF PUBLICATION

November 12, 2025

I, Larnyce Tabron, in my capacity as a Principal Clerk of the Publisher of The New York Times, a daily newspaper of general circulation printed and published in the City, County, and State of New York, hereby certify that the advertisement annexed hereto was published in the editions of The New York Times on the following date or dates, to wit on.

11/10/2025, NY/NATL, pg B3

Larnyce Tabron

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: AGOP HOLDING INC., et al.,
Debtors.

Chapter 11
Case No. 25-11446 (MFW)
(Jointly Administered)

NOTICE OF HEARING TO CONSIDER FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE DEBTORS' CHAPTER 11 PLAN AND RELATED VOTING AND OBJECTION DEADLINES

THIRD-PARTY RELEASE: Please be advised that Article IX of the Plan contains certain release, exculpation, and injunction provisions. Article IX.E of the Plan contains a Third-Party Release. You are advised and encouraged to carefully review and consider the Plan, including the release, exculpation, and injunction provisions set forth in Article IX of the Plan as your rights may be affected.

PLEASE TAKE NOTICE that, on August 4, 2025 (the "Petition Date"), the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), in the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that, on October 15, 2025, the Debtors filed the Debtors' Joint Chapter 11 Plan of Liquidation for AGOP Holding Inc. and its Affiliated Debtors (as may be amended, modified, or supplemented from time to time, the "Plan"), and a Disclosure Statement for the Plan (as may be amended, modified, or supplemented from time to time, the "Disclosure Statement"), pursuant to sections 1125 and 1126(b) of the Bankruptcy Code. On November 4, 2025, the Court entered an order approving the Disclosure Statement on an interim basis for solicitation purposes only (Order No. 400). Copies of the Plan and Disclosure Statement (and all exhibits thereto) may be obtained free of charge by (i) visiting the website maintained by Kurtzman Carson Consultants, LLC, dba Vesta Global (the "Notice and Claims Agent"), at <https://www.vestaglobal.net/AGOP>; (ii) calling (866) 523-7951 (U.S./Canada toll free) or +1 (781) 575-2140 (international); or (iii) submitting an inquiry via www.vestaglobal.net/contact. Copies may also be obtained for a fee via PACER at <http://www.ecb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that the record date to determine which Claims in each of the Voting Classes are entitled to vote on the Plan is November 2, 2025 (the "Voting Record Date"). Only holders of Claims in Class 3 (Prepetition Deficiency Claims) and Class 4 (General Unsecured Claims) are entitled to vote to accept or reject the Plan. All other classes of Claims and interests are deemed either to accept or reject the Plan and, therefore, are not entitled to vote. The deadline for voting on the Plan is **December 8, 2025, at 5:00 p.m., prevailing Eastern Time** (the "Voting Deadline"). If you received a Solicitation Package, including a Ballot, and intend to vote on the Plan, you must: (a) follow the instructions carefully; (b) complete all of the required information on the Ballot; and (c) execute and return your completed Ballot according to and as set forth in detail in the voting instructions so that it is **actually received** by the Notice and Claims Agent on or before the Voting Deadline.

PLEASE TAKE FURTHER NOTICE that the hearing at which the Court

will consider confirmation of the Plan (the "Combined Confirmation Hearing") will commence on **December 18, 2025, at 3:00 p.m., prevailing Eastern Time**, before the Honorable Mary F. Walcott, in the United States Bankruptcy Court for the District of Delaware, located at 824 Market Street, Courtroom No. 4, Wilmington, Delaware 19801 (a via remote video). The Combined Confirmation Hearing may be continued from time to time by the Court or the Debtors (in consultation with the Committee) without further notice other than by such adjournment being announced in open court and/or a notice of adjournment filed with the Court and served on the Rule 2002 list.

PLEASE TAKE FURTHER NOTICE that the deadline for filing objections to final approval of the Disclosure Statement and confirmation of the Plan is **December 8, 2025, at 4:00 p.m., prevailing Eastern Time** (the "Objection Deadline"). Any objections must: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Rules, and any orders of the Court; (c) state the name of the objecting party and the amount and nature of the Claim or interest of such party; (d) state, with particularity, the legal and factual basis for and the nature of any objection and, if practicable, a proposed modification to the Plan that would resolve such objection; and (e) be filed with the Court, together with proof of service, so as to be **actually received** on or before the Objection Deadline.

UNLESS AN OBJECTION IS TIMELY SERVED AND FILED IN ACCORDANCE WITH THIS NOTICE (THIS "NOTICE"), IT MAY NOT BE CONSIDERED BY THE COURT.

PLEASE TAKE FURTHER NOTICE that this Notice is subject to fuller terms and conditions of the Plan with such Plan controlling in the event of any conflict. The Debtors encourage all parties in interest to review the Plan and the Disclosure Statement in their entirety.

Dated: November 5, 2025, Wilmington, Delaware. **YOUNG CONARBY STANBURY & TAYLOR, LLP**, by */s/ S. Alexander Farris*, Edmon L. Moran (No. 2856), Sean M. Beach (No. 4070), Kenneth J. Enos (No. 4544), S. Alexander Farris (No. 6278), Sarah Guryyniak (No. 7403), Evan S. Sarak (No. 7452), 1000 North King Street, Rodney Square, Wilmington, Delaware 19801. Telephone: (302) 571-6600. Facsimile: (302) 571-1253. Email: emoran@yconlaw.com, sbeach@yconlaw.com, kjenos@yconlaw.com, sfarris@yconlaw.com, sguryyniak@yconlaw.com, esarak@yconlaw.com, Counsel to the Debtors and Debtor in Possession.

The Debtors in these chapters 11 cases, together with the last four digits of the Debtors' federal tax identification numbers, are AGOP Holding Inc. (1604); Arant Garbino, LLC (1604); AG Management Prod LLC (1942); EZ Festival LLC (8854); Made Events LLC (6272); and Reynard Productions, LLC (5431). The Debtors' service address is 140 Stewart Ave, Brooklyn, NY 11237. Att-General/Counsel.

Capitalized terms used and not defined have the meanings given to them in the Plan and Disclosure Statement, as applicable.

When filed, copies of the Plan Supplement (which may occur in multiple installments) will also be available through the Notice and Claims Agent free of charge and via PACER for a fee. The Debtors will file the initial Plan Supplement no later than seven days prior to the Voting Deadline and will serve notice on all holders of Claims entitled to vote on the Plan, which will: (a) inform parties that the Debtors filed the Plan Supplement; (b) list the information contained in the Plan Supplement; and (c) explain how parties may obtain copies of the Plan Supplement.



[Signature]

TECHNOLOGY | ACQUISITIONS

Examining How A.I. and Social Media Play a Role in ‘Brain Rot’

FROM FIRST BUSINESS PAGE

net content. When Oxford University Press, the publisher of the Oxford English Dictionary, named brain rot the word of the year in 2024, the definition referred to how social media apps like TikTok and Instagram had people hooked on short videos, turning their brains into mush.

Whether technology makes people dumber is a question as old as technology itself. Socrates faulted the invention of writing for weakening human memory. As recently as 2008, many years before the arrival of A.I.-generated web summaries, The Atlantic published an essay titled, “Is Google Making Us Stupid?” Those concerns turned out to be overblown.

But the growing wariness in academia of the impact of A.I. on learning (on top of older concerns about the distracting nature of social media apps) is troubling news for a country whose performance in reading comprehension is already in steep decline.

This year, reading scores among children, including eighth graders and high school seniors, hit new lows. The results, gathered from the National Assessment of Educational Progress, long regarded as the nation’s gold-standard exam, were the first of their kind to be published since the Covid-19 pandemic disrupted education and drove up screen time among youths.

Researchers worry that evidence is mounting of a potent link between lower cognitive performance and A.I. and social media. In addition to recent studies that found a correlation between the use of A.I. tools and cognitive decline, a new study led by pediatricians found that social media use was associated with poorer performance among children taking reading, memo-

ry and language tests.

Here’s a summary on the research so far, and how to use A.I. in a way that boosts — rather than rots — the brain.

When we write with ChatGPT, are we even writing?

The most high-profile study this year about A.I.’s effects on the brain came out of the Massachusetts Institute of Technology, where researchers sought to understand how tools like OpenAI’s ChatGPT could affect how people write. The study, which involved 54 college students, had a small sample size, but the results raised important questions about whether A.I. could stifle people’s abilities to learn.

(The New York Times has sued OpenAI and its partner, Microsoft, claiming copyright infringement of news content related to A.I. systems. The two companies have denied those claims.)

For part of the study, students were asked to write an essay ranging from 500 to 1,000 words, and they were divided into groups: One group could write with the help of ChatGPT; a second group could look up information only with a traditional Google search, and a third group could rely only on their brains to compose their assignment.

The students were sensors that measured electrical activity in their brains. The ChatGPT users showed the lowest brain activity, which was unsurprising since they were letting the A.I. chatbot do the work.

But the most striking revelation arose after the students finished the writing exercise. One minute after completing their essays, the students were asked to quote any part of their essay. The vast majority of ChatGPT users (83 percent) could not recall a

single sentence.

In contrast, the students using Google’s search engine could quote some parts, and the students who relied on no tech could recite lots of lines, with some even quoting almost the entirety of their essays verbatim.

“It has been one minute, and you really cannot say anything?” said Nataliya Kosmyna, the research scientist at M.I.T. Media Lab who led the study, about the ChatGPT users. “If you don’t remember what you wrote, you don’t feel ownership. Do you even care?”

Though the study focused on essay writing, Dr. Kosmyna said she worried about the implications for people using A.I. chatbots in fields where retention is essential, like a pilot studying to get a license. More research needs to be done, she said, on how A.I. affects people’s ability to hold on to information.

Social media may be linked to lower reading scores.

Over the last two years, schools in states like New York, Indiana, Louisiana and Florida have raced to ban cellphones from classrooms, citing concerns that students were distracting themselves with social media apps like TikTok and Instagram. Lending credence to the bans, a study published last month found a potent link between social media use and poorer cognitive performance.

Last month, the medical journal JAMA published a study conducted by the University of California, San Francisco. Dr. Jason Nagata, a pediatrician who led the study, and his colleagues looked at data from ABCD, for Adolescent Brain Cognitive Development, a research project that followed more than 6,500 youths from age 9 to 13 from 2016 to 2018.

All the children were surveyed once a year on how much time they used social media. Every other year, they took several tests. For example, a visual vocabulary test involved correctly matching pictures to words they heard.

The data showed that children who reported using a low amount of social media (one hour a day) to a high amount (at least three hours a day) scored much lower on reading, memory and vocabulary tests than children who reported using no social media.

As for why social media apps like TikTok and Instagram would harm test scores, the only safe conclusion is that every hour a child spends scrolling through the apps takes time away from more enriching activities like reading and sleeping, Dr. Nagata said.

What are some healthier ways to use social media and A.I.?

Despite findings of a correlation between social media use and cognitive decline, it would be difficult to recommend an ideal amount of screen time for youths, because lots of children spend time in front of screens doing things unrelated to social media, like watching TV shows, Dr. Nagata said.

Instead, he suggested that parents enforce screen-free zones, prohibiting phone use in areas like the bedroom and dinner table so that children can stay focused on their studies and sleep.

Meta did not respond to a request for comment. A TikTok spokeswoman referred to a webpage with instructions to set up Time Away, a tool for parents to create schedules for when their teenagers are allowed to use TikTok.

As for A.I. chatbots, there was an interesting wrinkle in the M.I.T. study that presented a possible solution on how people could best use chatbots to

learn and write.

Eventually, the groups in that study swapped roles: The people who relied only on their brains to write got to use ChatGPT, and the people who had relied on ChatGPT could use only their brains. All the students wrote essays on the same topics they had chosen before.

The students who had originally relied only on their brains recorded the highest brain activity once they were allowed to use ChatGPT. The students who had initially used ChatGPT, on the other hand, were never on a par with the former group when they were restricted to using their brains, Dr. Kosmyna said.

That suggests that people who are eager to use chatbots for writing and learning should consider starting the process on their own before turning to the A.I. tools later in the process for revisions, similar to math students using calculators to solve problems only after they have used pencil and paper to learn the formulas and equations. Both Google and OpenAI declined to comment.

Dr. Melumad, the Wharton professor who led the earlier study involving A.I. search tools, said the problem with those tools was that they transformed what was once an active process in your brain — perusing through links and clicking on a credible source to read — into a passive one.

So perhaps the key to using A.I. in a healthier way, she said, is to try to be more mindful in how we use them. Rather than ask a chatbot to do all the research on a broad topic, Dr. Melumad said, use it as a part of your research process to answer small questions, such as looking up historical dates. But for deeper learning of a subject, consider reading a book.

Risks in Taking On Debt To Pay for the A.I. Boom

By IAN FRISCH

Like many companies trying to keep up in the A.I. boom, QTS Data Centers, a digital infrastructure company that’s wholly owned by the investment giant Blackstone, has been dropping billions of dollars to expand its network of cutting-edge computing facilities. It has also, like a growing number of fellow tech companies, found a way to unlock additional (and much-needed) cash: exotic financial instruments.

According to an investor offering sheet obtained by DealBook, Blackstone is on the cusp of closing a \$3.46 billion commercial-mortgage-backed securities (C.M.B.S.) offering to refinance debt held by QTS, the biggest player in the artificial intelligence infrastructure market. It would be the largest deal of its type this year in a fast-accelerating market. (Blackstone declined to comment.)

The bonds would be backed by 10 data centers in six markets (including Atlanta, Dallas and Norfolk, Va.) that together consume enough energy to power Burlington, Vt., for half a decade. Blackstone’s offering is part of the latest push in the A.I. infrastructure financing blitz. According to McKinsey, \$7 trillion in data center investment will be required by 2030 to keep up with projected demand. Google, Meta, Microsoft and Amazon have together spent \$112 billion on capital expenditures in the past three months alone.

The sheer scale of spending is spooking investors: Meta’s stock tumbled 11 percent after the company revealed its aggressive capital expenditure plans last month, and tech stocks sold off last week on overvaluation fears.

Now, the tech giants are turning to financing maneuvers that may add to the risk. To obtain the capital they need, hyperscalers have leveraged a growing list of

DealBook/

DealBook helps you make sense of the day’s most important business and policy headlines. Sign up for the newsletter at nytimes.com/dealbook

complex debt-financing options, including corporate debt, securitization markets, private financing and off-balance-sheet vehicles. That shift is fueling speculation that A.I. investments are turning into a game of musical chairs whose financial instruments are reminiscent of the 2008 financial crisis.

Big tech companies are looking for new sources of financing. While Meta, Microsoft, Amazon and Google previously relied on their own cash flow to invest in data centers, more recently they’ve turned to loans. To diversify their debt, they’re repackaging much of it as asset-backed securities (A.B.S.). About \$13.3 billion in A.B.S. backed by data centers has been issued across 27 transactions this year, a 55 percent increase over 2024.

If investors want to buy data center A.B.S., they have two options, according to Sarah McDonald, a senior vice president in the capital solutions group at Goldman Sachs: They can invest in a data center that has one tenant, like a hyperscaler, or in a co-location data center, which has thousands of smaller tenants. The former is an investment-grade tenant with a long-term lease, but the risk is highly concentrated; the latter is most likely renting out to noninvestment-grade tenants with short-term leases, but the investment is extremely diversified.

Digital infrastructure “is something that investors have a huge appetite for,” McDonald said.

Data center securities are a small slice of the A.B.S. market, which is dominated by credit card, auto and consumer loans.



ELLIAH NOUVELAGE/BLOOMBERG

A QTS data center in Georgia last year. Blackstone is close to completing a deal to refinance debt held by QTS.

Blackstone’s \$3.46 billion C.M.B.S. offering may seem like small potatoes compared with some other debt-fueled deals, such as Meta’s \$30 billion corporate offering to finance its data center in Louisiana. But it’s unprecedented for the C.M.B.S. market, where issuance for data-center-backed deals was just \$3 billion for all of 2024.

“They realize how much cash they’re going to need, so they’re getting the C.M.B.S. market comfortable with this type of asset,” said Dan McNamara, the founder and chief investment officer of Polpo Capital, a hedge fund that focuses on C.M.B.S. He added that while most traders in the market were well versed in assets like office space or industrial buildings, with data centers, “it’s not traditional ‘bricks and sticks’ commercial real estate.”

To complicate matters further, the share of single-asset-single-borrower securities (S.A.S.B.) — for example, the assets inside the bond being sold are all from the

same company or a single data center — is rising, with 13 percent of all S.A.S.B. deals coming from data centers, according to Goldman Sachs.

“It’s one company, and these assets are quite similar. If there’s a problem with A.I. data centers, like if their current chips are obsolete in five years, you could have big losses in these deals,” McNamara said. “That’s the knock on S.A.S.B.: When things go bad, they go really bad.”

Also at play: a financial tool that came into vogue before the financial crisis. Called a special purpose vehicle (S.P.V.), it’s a legal entity that allows a company to take on a lot of debt without having to hold it on its own balance sheet.

When Meta structured its \$30 billion debt offering for its new data center in Louisiana — the largest private capital transaction on record — Morgan Stanley arranged the debt to sit in one of these custom, off-balance-sheet vehicles. Although the S.P.V. was

created to service Meta, the debt technically belongs to the S.P.V., not Meta, which makes Meta look healthier on paper.

The maneuver made it easier for Meta to raise another \$30 billion in the more traditional corporate bond market. Overall, according to Morgan Stanley, \$800 billion in private credit will be needed over the next two years to fund data centers.

Are murky financial instruments spreading the risk of the A.I. spending frenzy? According to Menlo Ventures, only 3 percent of consumers pay for A.I.-related services, amounting to about \$12 billion per year. If hyperscalers are unable to generate enough profit to offset the costs related to capital expenditures, systemic risk could enter credit markets.

In October, the Bank of England wrote that, as companies continue to shift from using their own cash flow to amassing debt for data centers, risk will continue to mount.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE			
In re: AGCP HOLDING INC., et al., ¹	Chapter 11 Case No. 25-11446 (MFW) Debtors. (Jointly Administered)	Chapter 11 Case No. 25-90642 (CML) Debtors. (Jointly Administered)	
NOTICE OF HEARING TO CONSIDER FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE DEBTORS’ CHAPTER 11 PLAN AND RELATED VOTING AND OBJECTION DEADLINES			
THIRD-PARTY RELEASE: Please be advised that Article IX of the Plan contains certain release, excuplation, and injunction provisions. Article IX.B of the Plan contains a Third-Party Release. You are advised and encouraged to carefully review the Plan, including the release, excuplation, and injunction provisions set forth in Article IX of the Plan as your rights may be affected.			
PLEASE TAKE NOTICE that, on August 4, 2025 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), in the United States Bankruptcy Court for the District of Delaware (the “Court”).			
PLEASE TAKE FURTHER NOTICE that, on October 15, 2025, the Debtors filed the Debtors’ Joint Chapter 11 Plan of Liquidation for AGCP Holding Inc. and its Affiliated Debtors (as may be amended, modified, or supplemented from time to time, the “Plan”), and a disclosure statement for the Plan (as may be amended, modified, or supplemented from time to time, the “Disclosure Statement”), pursuant to sections 1125 and 1126(b) of the Bankruptcy Code. On November 4, 2025, the Court entered an order approving the Disclosure Statement on an interim basis for solicitation purposes only (Docket No. 400). Copies of the Plan and Disclosure Statement (and all exhibits thereto) may be obtained free of charge by: (a) visiting the website maintained by Kurtzman Carson Consultants, LLC dba Verita Global (the “Notice and Claims Agent”), at https://www.veritaglobal.net/AGCP ; (b) calling (866) 323-2951 (U.S. Canada Toll-Free) or +1 (781) 575-2140 (International); or (c) submitting an inquiry via www.veritaglobal.net/agcp/inquiry . Copies may also be obtained for a fee via PACER at http://www.deb.uscourts.gov .			
PLEASE TAKE FURTHER NOTICE that the record date to determine which Claims in each of the Voting Classes are entitled to vote on the Plan is November 2, 2025 (the “Voting Record Date”). Only holders of Claims in Class 3 (Prepetition Deficiency Claims) and Class 4 (General Unsecured Claims) are entitled to vote to accept or reject the Plan. All other classes of Claims and Interests are deemed either to accept or reject the Plan and, therefore, are not entitled to vote. The deadline for voting on the Plan is December 8, 2025, at 5:00 p.m., prevailing Eastern Time (the “Voting Deadline”). If you received a Solicitation Package, including a Ballot, (b) complete all of the required information on the Ballot; and (c) execute and return your completed Ballot according to and as set forth in detail in the voting instructions so that it is actually received by the Notice and Claims Agent on or before the Voting Deadline.			
PLEASE TAKE FURTHER NOTICE that the hearing at which the Court			

will consider confirmation of the Plan (the “Combined Confirmation Hearing”) will commence on **December 18, 2025, at 3:00 p.m., prevailing Eastern Time**, before the Honorable Mary F. Walcott, in the United States Bankruptcy Court for the District of Delaware, located at 824 Market Street, Courtroom No. 4, Wilmington, Delaware 19801 or via remote video. The Combined Confirmation Hearing may be continued from time to time by the Court or the Debtors (in consultation with the Committee) without further notice or other by such adjournment being announced in open court and/or a notice of adjournment filed with the Court and served on the Rule 2002 List.

PLEASE TAKE FURTHER NOTICE that the deadline for filing objections to final approval of the Disclosure Statement and confirmation of the Plan is **December 8, 2025, at 4:00 p.m., prevailing Eastern Time** (the “Objection Deadline”). Any objections must: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Rules, and any orders of the Court; (c) state the name of the objecting party and the amount and nature of the Claim or Interest of such party; (d) state, with particularity, the legal and factual basis for and the nature of any objection and, if practicable, a proposed modification to the Plan that would resolve such objection; and (e) be filed with the Court, together with proof of service, so as to be **actually received** on or before the Objection Deadline.

UNLESS AN OBJECTION IS TIMELY SERVED AND FILED IN ACCORDANCE WITH THIS NOTICE (THIS “NOTICE”), IT MAY NOT BE CONSIDERED BY THE COURT.

PLEASE TAKE FURTHER NOTICE that this Notice is subject to fuller terms and conditions of the Plan with such Plan controlling in the event of any conflict. The Debtors encourage all parties in interest to review the Plan and the Disclosure Statement in their entirety.

Dated: November 5, 2025, Wilmington, Delaware, **YOUNG CONAWAY STARGATT & TAYLOR, LLP, c/s, S. Alexander Faris**, Edmon L. Morton (No. 3856), Sean M. Beach (No. 4070), Kenneth J. Enos (No. 4544), S. Alexander Faris (No. 6278), Sarah Gawrysiak (No. 7403), Evan S. Sarak (No. 7452), 1000 North King Street, Rodney Square, Wilmington, Delaware 19801, Telephone: (302) 571-6600, Facsimile: (302) 571-1253, Email: enorton@yct.com, sbeach@yct.com, kenos@yct.com, afaris@yct.com, sgawrysiak@yct.com, esarak@yct.com, Counsel to the Debtors and Debtors’ Counsel.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION
In re: Chapter 11
KLEOPATRA FINCO S.A R.L., et al.,¹ Case No. 25-90642 (CML)
Debtors. (Jointly Administered)

NOTICE OF COMMENCEMENT OF PREPACKAGED CHAPTER 11 BANKRUPTCY CASES AND HEARING ON THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE JOINT PREPACKAGED CHAPTER 11 PLAN

PLEASE TAKE NOTICE that on November 4, 2025 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed with the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”) the Joint Prepackaged Plan of Reorganization of Kleopatra Finco S.A.R.L. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 5) (as amended, supplemented, or otherwise modified from time to time, the “Plan”) and proposed Disclosure Statement for the Joint Prepackaged Plan of Reorganization of Kleopatra Finco S.A.R.L. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 6) (as amended, supplemented, or otherwise modified from time to time, the “Disclosure Statement”) pursuant to sections 1125 and 1126(b) of title 11 of the United States Code (the “Bankruptcy Code”), any objections thereto, and any other matter that may properly come before the Bankruptcy Court. Please be advised that the Combined Hearing and the Chapter 11 Cases are available free of charge, as applicable, by: (a) visiting the Debtors’ restructuring website at <https://cases.stretto.com/klcdebtors>; (b) emailing KFinco@stretto.com (with “Kleopatra – Solicitation Inquiries”) or (c) calling the Claims and Noticing Agent at (833) 212-9915 (USA or Canada) (toll-free) or +1 (949) 273-2457 (International). You may also obtain copies of any pleadings filed in the Chapter 11 Cases via PACER at <https://www.pacer.gov> (for a fee).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Combined Hearing”) will be held before the Honorable Christopher M. Lopez, United States Bankruptcy Judge, on December 16, 2025, at 1:00 p.m. (prevailing Central Time) in Courtroom 402, 4th floor, 515 Rusk Street, Houston, Texas 77002, to consider the adequacy of the Disclosure Statement, any objections to the Disclosure Statement, confirmation of the Plan, any objections thereto, and any other matter that may properly come before the Bankruptcy Court. Please be advised that the Combined Hearing and the Chapter 11 Cases are available free of charge, as applicable, by: (a) visiting the Debtors’ restructuring website at <https://cases.stretto.com/klcdebtors>; (b) emailing KFinco@stretto.com (with “Kleopatra – Solicitation Inquiries”) or (c) calling the Claims and Noticing Agent at (833) 212-9915 (USA or Canada) (toll-free) or +1 (949) 273-2457 (International). You may also obtain copies of any pleadings filed in the Chapter 11 Cases via PACER at <https://www.pacer.gov> (for a fee).

PLEASE TAKE FURTHER NOTICE that the deadline for filing objections to final approval of the Disclosure Statement and confirmation of the Plan is **December 8, 2025, at 4:00 p.m., prevailing Eastern Time** (the “Objection Deadline”). Any objections must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Bankruptcy Local Rules; (c) state the name and address of the objecting party and the amount and nature of the Claim or Interest of such party; (d) state, with particularity, the legal and factual basis for such objections, and, if practicable, a proposed modification to the Plan that would resolve such objections; and (e) be filed with the Court with proof of service thereof and served upon the Notice Parties so as to be **actually received** by the Objection Deadline.

UNLESS AN OBJECTION IS TIMELY SERVED AND FILED IN ACCORDANCE WITH THIS NOTICE (THIS “NOTICE”), IT MAY NOT BE CONSIDERED BY THE COURT.

PLEASE TAKE FURTHER NOTICE that the hearing at which the Court

parties: (i) Debtors: Kleopatra Finco S.A R.L., 3585 Mckinney Road, Gordonsville, VA 22942, Attention: Marc Rotella, Chief Financial Officer, Shene Mitchell, Deputy General Counsel, E-mail address: marc.rotella@klcdebtors.com; (ii) Proposed Counsel to the Debtors: Kirkland & Ellis LLP, 333 West Wall Plaza, Chicago, Illinois 60654, Attention: Chad J. Husnick, P.C., John R. Lutz, P.C., Jeffrey T. Michalko, David R. Gremling, E-mail address: chad.husnick@kirkland.com, john.lutz@kirkland.com, jeff.michalko@kirkland.com, dave.gremling@kirkland.com; and (iii) Joint Prepackaged Plan of Reorganization of Kleopatra Finco S.A.R.L. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 5) (as amended, supplemented, or otherwise modified from time to time, the “Plan”) and proposed Disclosure Statement for the Joint Prepackaged Plan of Reorganization of Kleopatra Finco S.A.R.L. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 6) (as amended, supplemented, or otherwise modified from time to time, the “Disclosure Statement”) pursuant to sections 1125 and 1126(b) of title 11 of the United States Code (the “Bankruptcy Code”), any objections thereto, and any other matter that may properly come before the Bankruptcy Court. Please be advised that the Combined Hearing and the Chapter 11 Cases are available free of charge, as applicable, by: (a) visiting the Debtors’ restructuring website at <https://cases.stretto.com/klcdebtors>; (b) emailing KFinco@stretto.com (with “Kleopatra – Solicitation Inquiries”) or (c) calling the Claims and Noticing Agent at (833) 212-9915 (USA or Canada) (toll-free) or +1 (949) 273-2457 (International). You may also obtain copies of any pleadings filed in the Chapter 11 Cases via PACER at <https://www.pacer.gov> (for a fee).

PLEASE TAKE FURTHER NOTICE that the deadline for filing objections to final approval of the Disclosure Statement and confirmation of the Plan is **December 8, 2025, at 4:00 p.m., prevailing Eastern Time** (the “Objection Deadline”). Any objections must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Bankruptcy Local Rules; (c) state the name and address of the objecting party and the amount and nature of the Claim or Interest of such party; (d) state, with particularity, the legal and factual basis for such objections, and, if practicable, a proposed modification to the Plan that would resolve such objections; and (e) be filed with the Court with proof of service thereof and served upon the Notice Parties so as to be **actually received** by the Objection Deadline.

UNLESS AN OBJECTION IS TIMELY SERVED AND FILED IN ACCORDANCE WITH THIS NOTICE (THIS “NOTICE”), IT MAY NOT BE CONSIDERED BY THE COURT.

PLEASE TAKE FURTHER NOTICE that the hearing at which the Court

parties: (i) Debtors: Kleopatra Finco S.A R.L., 3585 Mckinney Road, Gordonsville, VA 22942, Attention: Marc Rotella, Chief Financial Officer, Shene Mitchell, Deputy General Counsel, E-mail address: marc.rotella@klcdebtors.com; (ii) Proposed Counsel to the Debtors: Kirkland & Ellis LLP, 333 West Wall Plaza, Chicago, Illinois 60654, Attention: Chad J. Husnick, P.C., John R. Lutz, P.C., Jeffrey T. Michalko, David R. Gremling, E-mail address: chad.husnick@kirkland.com, john.lutz@kirkland.com, jeff.michalko@kirkland.com, dave.gremling@kirkland.com; and (iii) Joint Prepackaged Plan of Reorganization of Kleopatra Finco S.A.R.L. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 5) (as amended, supplemented, or otherwise modified from time to time, the “Plan”) and proposed Disclosure Statement for the Joint Prepackaged Plan of Reorganization of Kleopatra Finco S.A.R.L. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 6) (as amended, supplemented, or otherwise modified from time to time, the “Disclosure Statement”) pursuant to sections 1125 and 1126(b) of title 11 of the United States Code (the “Bankruptcy Code”), any objections thereto, and any other matter that may properly come before the Bankruptcy Court. Please be advised that the Combined Hearing and the Chapter 11 Cases are available free of charge, as applicable, by: (a) visiting the Debtors’ restructuring website at <https://cases.stretto.com/klcdebtors>; (b) emailing KFinco@stretto.com (with “Kleopatra – Solicitation Inquiries”) or (c) calling the Claims and Noticing Agent at (833) 212-9915 (USA or Canada) (toll-free) or +1 (949) 273-2457 (International). You may also obtain copies of any pleadings filed in the Chapter 11 Cases via PACER at <https://www.pacer.gov> (for a fee).