

**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)

Ref. Docket No. 417

**SUPPLEMENT TO FIRST INTERIM FEE APPLICATION
OF YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Young Conaway Stargatt & Taylor, LLP ("Young Conaway"), counsel to the above-captioned debtors and debtors in possession (collectively, the "Debtors"), hereby submits this supplement to the *First Interim Fee Application of Young Conaway Stargatt & Taylor, LLP* [D.I. 417] (the "First Interim Application") for the period from August 4, 2025 through October 31, 2025 (the "Application Period") by attaching, as Exhibits A through E hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the "UST Guidelines"). In addition, Young Conaway respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

- a. During the Application Period, Young Conaway did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms.
- b. The fees sought by Young Conaway in the First Interim Application are more than 10% higher than the fees budgeted in the budget provided by Young Conaway to the Debtors for the Application Period. Young Conaway has discussed the higher fees with the Debtors, who approve.

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.



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- c. The professionals included in the First Interim Application did not vary their hourly rate based on the geographic location of the bankruptcy cases.
- d. The First Interim Application did not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.
- e. The time period covered by the First Interim Application includes approximately 12.20 hours with a value of \$13,115.00 spent by Young Conaway to ensure that the time entries subject to the First Interim Application comply with the Local Rules of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Young Conaway's preparation of each monthly fee application.
- f. The First Interim Application does not include any rate increases since Young Conaway's retention.

Dated: November 17, 2025
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ S. Alexander Faris

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EXHIBIT A**CUSTOMARY AND COMPARABLE
COMPENSATION DISCLOSURES**

Young Conaway's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by similarly skilled bankruptcy attorneys. In addition, Young Conaway's hourly rates for bankruptcy services are comparable to the rates charged by the Firm for other complex corporate and litigation matters. The rates charged by the Firm for the services performed in the prior calendar year in the practice areas that are comparable to the services performed by the Bankruptcy and Corporate Restructuring section – namely, Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation -are set forth below. Also included below is 2024 blended hourly rate information for all sections of the Firm, excluding the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

Category of Timekeeper	Blended Hourly Rate		
	Billed In comparable practice areas for preceding calendar year ¹	Billed Firm-wide for preceding calendar year ²	Billed This Application
Partner	\$971	\$998	\$1,235
Counsel	\$773	\$685	\$875
Associate	\$551	\$542	\$588
Paralegal	\$359	\$235	\$328
Aggregated:	\$715	\$705	\$814

¹ This column reflects the blended 2024 rates charged by the firm for complex corporate and litigation matters in the following sections of the firm: Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation.

² This column excludes blended hourly rates for the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

EXHIBIT B**SUMMARY OF TIMEKEEPERS INCLUDED
IN THE FIRST INTERIM APPLICATION**

Name	Title	Department	Date of First Admission	Fees Billed in the Application Period (\$)	Hours Billed in the Application Period	Hourly Rate Billed in the Application Period (\$)
Craig D. Gear	Partner	Business Planning & Tax	1990	197,550.00	131.70	1,500.00
James P. Hughes	Partner	Business Planning & Tax	1992	8,250.00	5.50	1,500.00
Edmon L. Morton	Partner	Bankruptcy	1999	449,952.00	348.80	1,290.00
Sean M. Beach	Partner	Bankruptcy	2001	682,708.00	552.80	1,235.00
Kevin A. Guerke	Partner	Bankruptcy	2001	355,424.00	306.40	1,160.00
Kenneth J. Enos	Partner	Bankruptcy	2004	211,237.50	196.50	1,075.00
Michael S. Neiburg	Partner	Bankruptcy	2009	7,417.50	6.90	1,075.00
Paul J. Loughman	Partner	Corporate	2009	824.00	0.80	1,030.00
John C. Kuffel	Partner	Real Estate	2004	184.50	0.30	615.00
Amanda Pooler	Counsel	Bankruptcy	2013	70,000.00	80.00	875.00
S. Alexander Faris	Associate	Bankruptcy	2016	495,648.00	688.40	720.00
Timothy R. Powell	Associate	Bankruptcy	2019	272.00	0.40	680.00
Christopher M. Lambe	Associate	Bankruptcy	2022	57,188.00	84.10	680.00
Daniel M. Cole	Associate	Business Planning & Tax	2021	195.00	0.30	650.00
Daniel Trager	Associate	Bankruptcy	2024	5,819.50	10.30	565.00
Andrew M. Lee	Associate	Bankruptcy	2022	128,402.00	235.60	545.00
Renae P. Pagano	Associate	Bankruptcy	2022	195,146.00	368.20	530.00

Emily K. Cowan	Associate	Business Planning & Tax	2023	124,424.00	241.60	515.00
Sarah Gawrysiak	Associate	Bankruptcy	2024	173,550.00	347.10	500.00
Evan S. Saruk	Associate	Bankruptcy	2025	131,300.00	262.60	500.00
Joshua Hall	Associate	Bankruptcy	2025	7,100.00	14.20	500.00
Eric A. Lovetri	Associate	Bankruptcy	2025	56,357.00	116.20	485.00
Katherine Majewski	Associate	Bankruptcy	2025	22,455.50	46.30	485.00
Nisha Desai	Associate	Corporate	2025	1,358.00	2.80	485.00
Brenda Walters	Paralegal	Bankruptcy	N/A	592.50	1.50	395.00
Debbie Laskin	Paralegal	Bankruptcy	N/A	79.00	0.20	395.00
Troy Bollman	Paralegal	Bankruptcy	N/A	46,469.50	120.70	385.00
Hubert T. Hannagan, III	Paralegal	Bankruptcy	N/A	1,386.00	3.60	385.00
Karen Luongo	Paralegal	Business Planning & Tax	N/A	288.00	0.80	360.00
Ashley M. Clarke	Paralegal	Real Estate	N/A	382.50	1.50	255.00
Monica Fratticci	Paralegal	Litigation	N/A	10,720.00	53.60	200.00
Patrick M. Foss	Paralegal	Litigation	N/A	228.00	1.20	190.00
Totals				3,442,908.00	4,230.90	

EXHIBIT C**BUDGET AND STAFFING PLAN**

Project Category	Estimated Hours	Estimated Fees
Case Administration (B001)	39.60	\$31,058.20
Court Hearings (B002)	316.80	\$248,465.60
Cash Collateral/DIP Financing (B003)	198.00	\$155,291.00
Schedules & Statements, U.S. Trustee Reports (B004)	79.20	\$62,116.40
Lease/Executory Contract Issues (B005)	198.00	\$155,291.00
Use, Sale or Lease of Property (363 issues) (B006)	1069.20	\$838,571.40
Claims Analysis, Objections and Resolutions (B007)	39.60	\$31,058.20
Meetings (B008)	277.20	\$217,407.40
Stay Relief Matters (B009)	39.60	\$31,058.20
Reclamation Claims and Reclamation Adversaries (B010)	39.60	\$31,058.20
Other Adversary Proceedings (B011)	871.20	\$683,280.40
Plan and Disclosure Statement (B012)	277.20	\$217,407.40
Creditor Inquiries (B013)	39.60	\$31,058.20
General Corporate Matters (B014)	198.00	\$155,291.00
Employee Matters (B015)	39.60	\$31,058.20
Asset Analysis (B016)	79.20	\$62,116.40
Retention of Professionals/Fee Issues (B017)	39.60	\$31,058.20
Fee Application Preparation (B018)	39.60	\$31,058.20
Travel (B019)	39.60	\$31,058.20
Utility Services (B020)	39.60	\$31,058.20
Totals	3,960.00	\$3,105,820.00

STAFFING PLAN		
Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budgeted Period	Average Rate¹
Partner	3	\$1,223.83
Counsel	-	-
Associate (7 or more years since first admission)	1	\$720.00
Associate (4-6 years since first admission)	-	-
Associate (less than 4 years since first admission)	2	\$500.00
Paralegal	1	\$385.00

¹ The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the budgeted Application Period.

EXHIBIT D**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENTS**

SUMMARY OF COMPENSATION BY PROJECT CATEGORY		
Project Category	Hours Billed	Fees Sought (\$)
Case Administration (B001)	35.80	17,830.00
Court Hearings (B002)	302.10	271,249.50
Cash Collateral/DIP Financing (B003)	220.40	162,661.00
Schedules & Statements, U.S. Trustee Reports (B004)	140.80	80,848.00
Lease/Executory Contract Issues (B005)	247.10	180,331.00
Use, Sale, or Lease of Property (363 issues) (B006)	1,089.00	989,734.50
Claims Analysis, Objections and Resolutions (B007)	48.90	36,156.00
Meetings (B008)	263.40	233,380.00
Stay Relief Matters (B009)	37.70	24,001.50
Other Adversary Matters (B011)	1,069.90	810,468.50
Plan and Disclosure Statement (B012)	329.00	286,848.00
Creditor Inquiries (B013)	17.40	11,155.50
General Corporate Matters (B014)	241.20	213,014.50
Employee Matters (B015)	28.30	20,660.50
Asset Analysis (B016)	0.40	212.00
Retention of Professionals/Fee Issues (B017)	121.90	72,482.00
Fee Application Preparation (B018)	26.80	23,073.00
Travel (B019)	5.60	5,834.50
Utility Services (B020)	3.60	2,168.00
Other Contested Matters (B0190)	1.60	800.00
Totals	4,230.90	3,442,908.00

SUMMARY OF EXPENSE REIMBURSEMENTS	
	Amount (\$)
Air/Rail Travel	1,417.00
Car/Bus/Subway Travel	58.34
Computerized Legal Research	5,502.30
Computerized Legal Research – Lexis	104.80
Computerized Legal Research – Westlaw	2,615.44
Corporation Service Co. – UCC/Lien Search	525.40
Delivery/Courier	190.00
Deposition/Transcript	2,521.55
Docket Retrieval/Search	101.40
Internet Access	10.00
Federal Express	172.23
Filing Fee	233.00
Outside Litigation Support	2,494.55
Postage	89.05
Reproduction Charges	1,703.70
Secretary of State	202.00
Working Meals	194.99
Total	18,135.750

EXHIBIT E

SUMMARY OF FIRST INTERIM APPLICATION	
Name of Applicant	Young Conaway Stargatt & Taylor, LLP
Name of Client	Debtor and Debtor in Possession
Time period covered by First Interim Application	August 4, 2025 through October 31, 2025
Total compensation sought during the Application Period	\$3,442,908.00
Total expenses sought during the Application Period	\$18,135.75
Petition Date	August 4, 2025
Retention Date	August 4, 2025
Date of order approving employment	September 2, 2025
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date	\$0.00
Total allowed expenses paid to date	\$0.00
Blended rate in the First Interim Application for all attorneys	\$835.70
Blended rate in the First Interim Application for all timekeepers	\$813.75
Compensation sought in the First Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$901,693.20
Expenses sought in the First Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$2,687.61
Number of professionals included in the First Interim Application	32
If applicable, number of professionals in the First Interim Application not included in staffing plan approved by client	25
If applicable, difference between fees budgeted and compensation sought during the Application Period	Amount Budgeted: \$3,107,000.00 Amount Sought: \$3,442,908.00 Difference: (\$335,908.00)
Number of professionals billing fewer than 15 hours to the case during the Application Period	15
Are any rates higher than those approved or disclosed at retention?	No.