

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

In re:	Chapter 11
ADGP HOLDING INC. et al.,	Case No. 25-11446 (MFW)
Debtors.	(Jointly Administered)
ADGP HOLDING INC. et al.,	
Plaintiff.	Adv. Proc. No. 25-51803 (MFW)
v.	
TVT Capital Source LLC, White Star Funding, Inc. d/b/a TVT Cap, Insta Funding LLC, and Pinnacle Business Funding LLC	
Defendants.	
TVT Capital Source LLC, White Star Funding, Inc. d/b/a TVT Cap, Insta Funding LLC,	
Third-Party Plaintiffs,	
v.	
Alex Capital Management LLC, Andrew Axelrod, Hooman Yazhari, Jurgen "Billy" Bildstein and Gary Richards,	
Third-Party Defendants.	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that Loren R. Barron, Esquire, enters her appearance for Third Party Defendants Gary Richards and Hooman Yazhari, pursuant to section 1109(b) of the Bankruptcy Reform Act of 1978, as codified in title 11 of the United States Code, 11 U.S.C. §§



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101-1532, Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of any and all notices and papers filed or entered in this adversary proceeding, be served as follows:

LEWIS BRISBOIS BISGAARD & SMITH LLP

Loren R. Barron, Esquire (No. 5590)
500 Delaware Ave., Suite 700
Wilmington, DE 19801
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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by Gary Richards and Hooman Yazhari does not, and shall not be deemed or construed to: (a) constitute a submission by Gary Richards and Hooman Yazhari to the jurisdiction of the Bankruptcy Court; or (b) constitute consent by Gary Richards and Hooman Yazhari to entry by the Bankruptcy Court of any final order or judgment, or any other order having the effect of a final order or judgment, in any non-core proceeding or with respect to any matter for which the Bankruptcy Court lacks jurisdiction and/or constitutional authority to enter a final order, **which consent is hereby withheld unless expressly granted in the future with respect to a specific issue, matter, or proceeding.**

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by Gary Richards and Hooman Yazhari does not, and shall not be deemed or construed to be a waiver or relinquishment of any substantive or procedural right, including but not limited to: (a) the right to challenge the constitutional authority of the Bankruptcy Court to enter a final order or judgment on, or any other order having the effect of a final order or judgment on, any matter; (b) the right to trial by jury in any proceedings so triable herein, in any associated adversary proceedings, in any litigation presently or hereafter pending in any other court, or in any other case, controversy, or proceeding; (c) the right to seek withdrawal of the bankruptcy reference by a United States District Court in any matter subject to mandatory or discretionary withdrawal; and/or (d) any other rights, claims, actions, arguments, counterarguments, defenses, setoffs, or recoupments to which Gary Richards and Hooman Yazhari is or may be entitled under agreements, at law, in equity, or otherwise, all of which rights, claims, actions, arguments, counterarguments, defenses, setoffs, and recoupments are expressly reserved, nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers as to Gary Richards and Hooman Yazhari for which mailed or personal service is required under any applicable law, rule, regulation, or order.

Dated: November 13, 2025

/s/ Loren R. Barron_____

Loren R. Barron, Esquire (No. 5590)

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