

**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 Nos. 417, 422, 423, 424 & 432

**CERTIFICATION OF COUNSEL REGARDING
PROPOSED OMNIBUS ORDER APPROVING FIRST INTERIM
FEE APPLICATIONS OF VARIOUS RETAINED PROFESSIONALS**

On November 10, 2025, certain professionals (collectively, the “Debtors’ Professionals”) retained and employed by the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed their first applications for interim allowance of compensation and reimbursement of expenses [D.I. 417] (collectively, the “Debtors’ Professionals Applications”)² for the interim period from August 4, 2025 through and including October 31, 2025 with the United States Bankruptcy Court for the District of Delaware (the “Court”). In addition, on the same date, the professionals retained and employed by the official committee of unsecured creditors (collectively, the “Committee’s Professionals”) filed their first applications for interim allowance of compensation and reimbursement of expenses [D.I. 422, 423 and 424, respectively] (together with the Debtors’ Professionals Applications, each, an “Interim Fee Application,” and collectively, the “Interim Fee Applications”) for the interim period from August 19, 2025 through and including October 31, 2025 with the Court. Objections, if any, to the Interim

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.

² On November 17, 2025, Young Conaway Stargatt & Taylor, LLP filed a supplement [D.I. 432] to its Interim Fee Application, as defined herein.



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Fee Applications were required to be filed and served on or before November 24, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”).

The undersigned certifies that he has reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Interim Fee Applications appears thereon. As no responses were received prior to the Objection Deadline, the Debtors hereby submit a proposed form of order (the “Proposed Order”), attached hereto as **Exhibit A**, approving the Interim Fee Applications.

The Debtors have circulated the Proposed Order to the Debtors’ Professionals and the Committee’s Professionals, who have each reviewed and agreed to entry of the Proposed Order. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience without further notice or a hearing.

[Signature Page Follows]

Dated: November 26, 2025
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ S. Alexander Faris

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Exhibit A

Proposed Order

**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 Nos. 417, 422, 423, 424, 432 & ____

**OMNIBUS ORDER APPROVING FIRST INTERIM
FEE APPLICATIONS OF VARIOUS RETAINED PROFESSIONALS**

Upon consideration of the first interim fee applications (each, an “Interim Fee Application,” and collectively, the “Interim Fee Applications”) filed by certain professionals (collectively, the “Professionals”) retained and employed by the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and the official committee of unsecured creditors, as identified on **Exhibit 1** attached hereto, for allowance of compensation and reimbursement of expenses; and this Court having determined that this Court has jurisdiction to consider this matter in accordance with 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that the requirements of sections 327, 328, 330, 331, and 503(b) of title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and the Local Rules of the United States Bankruptcy Court for the District of Delaware have been satisfied; and it further appearing that the services rendered and expenses incurred were

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reasonable and necessary; and due and proper notice of the Interim Fee Applications having been given; and having determined that no other or further notice of the Interim Fee Applications is required; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Applications are APPROVED with respect to the amounts set forth on **Exhibit 1** attached hereto.

2. The Professionals are granted interim allowance of compensation in the amounts set forth on **Exhibit 1**, including any and all holdbacks.

3. The Professionals are allowed reimbursement of reasonable and necessary expenses in the amounts set forth on **Exhibit 1**.

4. The Debtors are authorized and directed to remit payment to the Professionals in the amounts set forth on **Exhibit 1**, less all amounts previously paid on account of such fees and expenses.

5. This Order shall be deemed a separate order for each Professional and any appeal of this Order with respect to any Professional shall have no effect on the authorized fees and expenses of any other Professional.

6. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Exhibit 1

Professional/Role	Interim Fee Period/ Docket No.	Total Fees Approved	Total Expenses Approved	Amount of Holdback Fees Approved (20% of Fees)
Young Conaway Stargatt & Taylor, LLP – <i>Counsel to the Debtors and Debtors in Possession</i>	8/4/25 – 10/31/25 [D.I. 417 & 432]	\$3,442,908.00	\$18,135.75	\$688,581.60
Triple P TRS, LLC – <i>Restructuring Advisor for the Debtors and Debtors in Possession</i>	8/4/25 – 10/31/25 [D.I. 417]	\$1,142,277.00	\$31,510.31	\$228,455.40
Kurtzman Carson Consultants, LLC dba Verita Global – <i>Administrative Advisor to the Debtors and Debtors in Possession</i>	8/4/25 – 9/30/25 [D.I. 417]	\$39,388.80	\$0.00	\$7,877.76
Orrick, Herrington & Sutcliffe LLP – <i>Co-Counsel to the Official Committee of Unsecured Creditors</i>	8/19/25 – 10/31/25 [D.I. 422]	\$1,760,998.49	\$18,905.13	\$352,199.69
Morris James LLP – <i>Co-Counsel to the Official Committee of Unsecured Creditors</i>	8/20/25 – 10/31/25 [D.I. 423]	\$223,865.50	\$880.65	\$44,773.10
IslandDundon LLC – <i>Financial Advisor to the Official Committee of Unsecured Creditors</i>	8/20/25 – 10/31/25 [D.I. 424]	\$503,287.00	\$139.68	\$100,657.40