

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)

DECLARATION OF MICHAEL PAQUE WITH RESPECT TO THE TABULATION OF
VOTES ON THE DEBTORS' JOINT CHAPTER 11 PLAN OF LIQUIDATION FOR
AGDP HOLDING INC. AND ITS AFFILIATED DEBTORS

I, Michael Paque, depose and say under the penalty of perjury:

1. I am a Managing Director of Corporate Restructuring Services, employed by Kurtzman Carson Consultants, LLC, doing business as Verita Global LLC (“**Verita**”), whose main business address is 222 North Pacific Coast Highway, 3rd Floor, El Segundo, California 90245. I am above eighteen years of age, and I am competent to testify. Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this declaration (the “**Declaration**”) on behalf of Verita. If I were called to testify, I could and would testify competently as to the facts set forth herein.

2. I submit this Declaration regarding the solicitation of votes and the tabulation of Ballots cast on the *Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and its Affiliated Debtors* [Docket No. 404] (as may amended, modified, or supplemented from time to time, the “**Plan**”).

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.



3. The Court authorized Verita’s retention (a) as claims and noticing agent to the Debtors on August 5, 2025, pursuant to the *Order Appointing Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date* [Docket No. 35], and (b) as administrative advisor to the Debtors on September 2, 2025, pursuant to the *Order Authorizing the Debtors to Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date* [Docket No. 127] (together, the “**Retention Orders**”). The Retention Orders authorize Verita to assist the Debtors with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject the Plan. Verita and its employees have considerable experience in soliciting and tabulating votes to accept or reject chapter 11 plans.

4. On November 4, 2025, the Court entered the *Order (I) Approving (A) the Adequacy of the Disclosure Statement on an Interim Basis; (B) the Solicitation and Notice Procedures with Respect to Confirmation of the Debtors’ Joint Chapter 11 Plan; and (C) the Forms of Ballots and Notices in Connection Therewith; (II) Scheduling Certain Dates with Respect Thereto; and (III) Granting Related Relief* [Docket No. 400] (the “**Disclosure Statement Order**”),² establishing, among other things, the Solicitation and Voting Procedures. Verita adhered to the procedures outlined in the Disclosure Statement Order and caused the Ballots to be distributed to parties entitled to vote on the Plan. I supervised the solicitation and tabulation performed by Verita’s employees.

A. Service and Transmittal of Solicitation Packages and Related Information

5. Pursuant to the Disclosure Statement Order, on November 7, 2025, and from time to time thereafter, Verita caused the Solicitation Packages to be served on all known Holders of Claims in Class 3 (Prepetition Deficiency Claims) and Class 4 (General Unsecured Claims) (collectively,

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan or the Disclosure Statement Order, as applicable.

the “**Voting Classes**”). In lieu of a Solicitation Package, all known Holders of Claims and Interests in Class 1 (Secured Claims), Class 2 (Other Priority Claims), Class 5 (Subordinated Claims), Class 6 (Intercompany Claims), and Class 7 (Interests) (collectively, the “**Non-Voting Classes**”) received an appropriate Notice of Non-Voting Status.³ Furthermore, Verita caused 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* [Docket No. 406] (the “**Combined Confirmation Hearing Notice**”) to be served on the creditor matrix and all other parties required to receive such notice pursuant to the Disclosure Statement Order. A *Certificate of Service* evidencing the completion of solicitation was filed with the Court on November 13, 2025 [Docket No. 427].

6. On November 7, 2025, Verita posted links to the electronic versions of the Disclosure Statement Order, Plan, Disclosure Statement, the Combined Confirmation Hearing Notice, Cover Letter, and Committee Letter on the public access website at www.veritaglobal.net/AGDP.

7. The Combined Confirmation Hearing Notice was published on November 10, 2025, in *The New York Times* (national edition). The *Affidavit of Publication* evidencing the publication of the Confirmation Hearing Notice was filed with the Court on November 14, 2025 [Docket No. 430].

8. Verita also forwarded Solicitation Packages and Confirmation Hearing Notices to voting and creditor matrix parties, as applicable, whose packages were returned with a forwarding address or if an alternate address was available. The supplemental certificates of service evidencing the foregoing was filed with the Court on November 24, 2025 [Docket No. 443], on December 4, 2025 [Docket No. 464], and December 10, 2025 [Docket No. 469] (together with the certificate of service filed on November 7, 2025, the “**Solicitation Certificates**”).

³ Pursuant to paragraph 18 of the Disclosure Statement Order, the Debtors were not required to provide Class 6 (Intercompany Claims) with a Solicitation Package or any other type of notice in connection with solicitation or Plan confirmation.

B. The Tabulation Process

9. The Disclosure Statement Order established November 2, 2024, as the Voting Record Date to determine which Holders of Claims and Interests were entitled to receive the Solicitation Package or the Non-Voting Status Notice, as applicable. Pursuant to the Disclosure Statement Order, Holders of Claims in Class 3 (Prepetition Deficiency Claims), and Class 4 (General Unsecured Claims) were entitled to vote to accept or reject the Plan. No other Classes were entitled or permitted to vote on the Plan.

10. In accordance with the Solicitation and Voting Procedures, Verita worked closely with the Debtors' advisors to identify the Holders of Claims in the Voting Classes entitled to vote as of the Voting Record Date, and to coordinate the distribution of Solicitation Packages to such Holders. A detailed description of Verita's distribution of Solicitation Packages is set forth in the Solicitation Certificates.

11. Pursuant to the Disclosure Statement Order, Verita relied on the Debtors' Schedules of Assets and Liabilities and the Claims information reflected in Verita's CaseView⁴ system to identify and solicit Holders of Claims in the Voting Classes.

12. In accordance with the Solicitation and Voting Procedures, Verita received, reviewed, determined the validity of, and tabulated the Ballots submitted to vote on the Plan. Each Ballot submitted to Verita was date-stamped, scanned, assigned a Ballot number, entered into Verita's voting database, and processed. To be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Solicitation and Voting Procedures, (b) executed by the relevant Holder entitled to vote on the Plan (or such Holder's representative), (c) returned to Verita via an approved method of delivery set forth in the Solicitation and Voting Procedures unless the

⁴ CaseView is Verita's claims management database, which stores the records and images associated with all scheduled and filed claims.

delivery method requirement was waived by the Debtors, and (d) received by Verita on or before December 8, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “**Voting Deadline**”).

13. The Solicitation and Voting Procedures permit the Debtors to accept Ballots received after the Voting Deadline in the Debtors’ sole discretion, and in accordance therewith, the Debtors have also allowed and tabulated the Ballots received after the voting Deadline so long as they were received by December 9, 2025 (the “**Late-Filed Deadline**”). Accordingly, all Ballots cast by Holders entitled to vote in the Voting Classes and received by Verita on or before the Voting Deadline or Late-Filed Deadline were tabulated pursuant to the Solicitation and Voting Procedures. Verita completed its final tabulation of the Ballots on December 10, 2025, following a complete review and audit of all Ballots received.

14. The Solicitation and Voting Procedures permit the Debtors to accept Ballots received via email at their sole discretion, and in accordance therewith, the Debtors have also allowed and tabulated the ballot received from Anthony J. Centone, PC, (Ballot No. 41) which was submitted to Verita via email.

15. The final tabulation of votes cast by timely and properly completed Ballots received by Verita is attached hereto as **Exhibit A** (the “**Final Ballot Tabulation**”). The detailed Ballot reports for the Class 3 (Prepetition Deficiency Claims), and Class 4 (General Unsecured Claims) are attached to this Declaration as **Exhibit A-1** and **Exhibit A-2**, respectively.

C. Opt In Election

16. Verita also reviewed and documented elections recorded on the Ballots from Holders of Claims in the Voting Classes that checked the box on such Ballot to opt into the Third-Party Releases. A report of all Entities who opted into the Third-Party Releases by checking the opt in box on their Ballot is attached hereto as **Exhibit B**. For the avoidance of doubt, this Declaration does not

certify the validity or enforceability of any opt-in elections received, including those reported on **Exhibit B**, but rather is providing these opt-in election results for reporting and informational purposes only.

D. Conclusion

17. To the best of my knowledge, information and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true.

Dated: December 16, 2025

/s/ Michael J. Paque

Michael J. Paque

Verita

222 N Pacific Coast Highway, 3rd Floor

El Segundo, CA 90245

Tel 310.823.9000

Exhibit A

Exhibit A
Ballot Tabulation Summary

Class	Class Description	Unacceptable Votes	Members Voted	Members Accepted	Members Rejected	Members Abstained	% Members Accepted	% Members Rejected	Total \$ Voted	\$ Accepted	\$ Rejected	\$ Abstained	% \$ Accepted	% \$ Rejected	Status
3	Prepetition Deficiency Claims	0	1	1	0	0	100.00	0.00	\$58,642,297.00	\$58,642,297.00	\$0.00	\$0.00	100.00	0.00	Accept
4	General Unsecured Claims	0	48	40	8	0	83.33	16.67	\$25,661,887.46	\$21,204,535.24	\$4,457,352.22	\$0.00	82.63	17.37	Accept

Exhibit A-1

Exhibit A-1

Class 3 Ballot Detail

Prepetition Deficiency Claims

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote
12/01/2025	30	Alter Domus (US) LLC, as Collateral Agent	\$58,642,297.00	Accept

Exhibit A-2

Exhibit A-2**Class 4 Ballot Detail
General Unsecured Claims**

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote	Third Party Release Opt In
11/10/2025	1	Brandon Perez	\$1,061.46	Accept	
11/11/2025	2	Jonah Flint	\$5,350.00	Accept	Yes
11/11/2025	3	Discotech LLC	\$8,841.60	Accept	Yes
11/12/2025	4	Creative Artists Agency, LLC	\$112,288.00	Accept	Yes
11/12/2025	5	Factory PR, LLC.	\$25,386.87	Accept	Yes
11/13/2025	6	McKinney Welding Supply Co Inc	\$17.42	Accept	
11/14/2025	7	Oaktree Solutions Ltd.	\$90,000.00	Accept	
11/15/2025	8	Lee Weber	\$167.48	Accept	
11/17/2025	9	Krystyna Valicenti	\$597.42	Accept	Yes
11/18/2025	11	Abbey Locksmiths Inc.	\$5,495.00	Accept	Yes
11/18/2025	12	Starr Security Group Inc.	\$3,000.00	Accept	
11/18/2025	13	The Sherwin-Williams Company	\$21,911.14	Accept	
11/18/2025	14	Stanton P.I. Inc.	\$26,162.50	Reject	
11/18/2025	15	Loupe Digital Inc	\$53,182.24	Accept	
11/19/2025	16	NRG Social Inc	\$600.00	Accept	
11/21/2025	17	Jonathan Tarnowski	\$351.24	Accept	Yes
11/24/2025	18	Christie Lites New York, LLC	\$603,313.90	Accept	
11/27/2025	19	Nova Traffic LTD (a Company of Schneider & Cie AG)	\$575,044.94	Accept	
11/24/2025	20	Wasserman Music, LLC and Each of Wassermans Clients Listed in the Attached Schedule	\$1,125,500.00	Accept	
11/24/2025	21	LA All The Way, LLC	\$475,000.00	Accept	Yes
11/24/2025	22	Charles D Music LLC	\$1,750.00	Accept	
11/24/2025	23	Flux Technical Productions LLC	\$4,714.89	Accept	Yes
11/24/2025	24	Cornucopia Cruise Lines Inc.	\$60,365.90	Accept	Yes
11/25/2025	25	Unreal Systems LLC	\$61,800.00	Accept	
11/29/2025	26	Buds & Blooms NY	\$43,982.81	Accept	
11/28/2025	27	Marc-Kevin de Vries	\$50,000.00	Accept	
11/30/2025	28	Olaoluwa Fafowora	\$6,651.00	Accept	Yes
12/01/2025	29	Mainfactor Inc.	\$4,323.47	Accept	Yes
12/01/2025	31	RSSA Consulting & Electric Corp.	\$15,805.00	Accept	
12/01/2025	32	AG Security Group, Inc.	\$161,348.12	Reject	
12/02/2025	33	Packin Realty Company, LLC	\$1,500,000.00	Accept	
12/03/2025	34	Hello Wood Zrt.	\$695,550.00	Accept	
12/03/2025	35	White Star Funding Inc. d/b/a TVT Cap	\$1,050,000.00	Reject	
12/03/2025	36	WeAreHouse78, LLC	\$127,384.83	Accept	

Exhibit A-2**Class 4 Ballot Detail
General Unsecured Claims**

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote	Third Party Release Opt In
12/03/2025	37	Brookside Environmental Inc	\$210,285.61	Accept	
12/04/2025	38	4LIVE Production GmbH Co. KG	\$8,015.47	Accept	
12/04/2025	39	ParaDocs Worldwide Inc	\$51,173.96	Reject	
12/05/2025	40	NYC Festivals, LLC, NYC Club Event, LLC, SFXE IP LLC, and LiveStyle Holdings, Inc.	\$11,954,684.44	Accept	
12/04/2025	41	ANTHONY J. CENTONE PC	\$550,017.34	Accept	
12/08/2025	42	Uline	\$11,153.70	Accept	
12/08/2025	43	The Bowery Presents, LLC	\$419,992.00	Accept	
12/08/2025	44	Insta Funding LLC	\$1,050,000.00	Reject	
12/08/2025	45	Pinnacle Business Funding LLC	\$1,050,000.00	Reject	
12/08/2025	46	TVT Capital Source LLC	\$1,050,000.00	Reject	
12/08/2025	47	Tomexpo AG	\$219,900.00	Accept	Yes
12/08/2025	50	Chateau Brooklyn LLC	\$18,667.64	Reject	
12/08/2025	51	Gateway Productions	\$2,067,007.56	Accept	Yes
12/09/2025	52	A Entretenimiento Musical NA, Inc.	\$84,042.51	Accept	

Exhibit B

Exhibit B**Opt In Elections**

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote	Third Party Release Opt In	Class
11/11/2025	2	Jonah Flint	\$5,350.00	Accept	Yes	4 - General Unsecured Claims
11/11/2025	3	Discotech LLC	\$8,841.60	Accept	Yes	4 - General Unsecured Claims
11/12/2025	4	Creative Artists Agency, LLC	\$112,288.00	Accept	Yes	4 - General Unsecured Claims
11/12/2025	5	Factory PR, LLC.	\$25,386.87	Accept	Yes	4 - General Unsecured Claims
11/17/2025	9	Krystyna Valicenti	\$597.42	Accept	Yes	4 - General Unsecured Claims
11/18/2025	11	Abbey Locksmiths Inc.	\$5,495.00	Accept	Yes	4 - General Unsecured Claims
11/21/2025	17	Jonathan Tarnowski	\$351.24	Accept	Yes	4 - General Unsecured Claims
11/24/2025	21	LA All The Way, LLC	\$475,000.00	Accept	Yes	4 - General Unsecured Claims
11/24/2025	23	Flux Technical Productions LLC	\$4,714.89	Accept	Yes	4 - General Unsecured Claims
11/24/2025	24	Cornucopia Cruise Lines Inc.	\$60,365.90	Accept	Yes	4 - General Unsecured Claims
11/30/2025	28	Olaoluwa Fafowora	\$6,651.00	Accept	Yes	4 - General Unsecured Claims
12/01/2025	29	Mainfactor Inc.	\$4,323.47	Accept	Yes	4 - General Unsecured Claims
12/08/2025	47	Tomexpo AG	\$219,900.00	Accept	Yes	4 - General Unsecured Claims
12/08/2025	51	Gateway Productions	\$2,067,007.56	Accept	Yes	4 - General Unsecured Claims