

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

AGDP HOLDING INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-11446 (MFW)

(Jointly Administered)

**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON FEBRUARY 12, 2026 AT 10:30 A.M. (ET)**

**THIS HEARING WILL BE CONDUCTED REMOTELY VIA ZOOM.  
PARTIES AND WITNESSES ARE PERMITTED, BUT NOT REQUIRED,  
TO APPEAR IN PERSON. THE COURT HAS NO PREFERENCE.**

**TO ATTEND THE HEARING REMOTELY, PLEASE REGISTER USING  
THE ECOURT APPEARANCES TOOL ON THE COURT'S WEBSITE AT  
[WWW.DEB.USCOURTS.GOV](http://WWW.DEB.USCOURTS.GOV) OR CLICK THE BELOW LINK:  
[HTTPS://ECF.DEB.USCOURTS.GOV/CGI-BIN/NYSBAPPEARANCES.PL](https://ecf.deb.uscourts.gov/cgi-bin/nysbappearances.pl)**

**REGISTRATION IS REQUIRED BY 4:00 P.M. (ET) THE LAST BUSINESS DAY  
BEFORE THE HEARING, UNLESS OTHERWISE NOTICED, USING THE  
ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE.**

**AFTER REGISTERING YOUR APPEARANCE,  
YOU WILL RECEIVE A CONFIRMATION EMAIL. ZOOM  
INFORMATION WILL BE SENT OUT PRIOR TO THE HEARING.**

**ADJOURNED/RESOLVED MATTERS**

1. Motion of Putative Class Plaintiffs Nicole Brockmole, Lauren Bair and Nick Ercklentz, for Limited Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 Authorizing the District Court for the Southern District of New York to Adjudicate the Motion for Class Certification to be Filed by the Putative Class Plaintiffs and Allowing the Litigation to Proceed Against Non-Debtor Parties [[D.I. 268](#); 10/2/25]

<sup>1</sup> 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.

<sup>2</sup> Amended items appear in bold.



Related Pleadings:

- a) Joinder of Putative Class Plaintiffs and Motion for an Order (I) Authorizing Putative Class Plaintiffs to File Motions for Class Certification and the Full Briefing Thereof by All Parties; (II) Authorizing the Adjudication of Motions for Class Certification; and (III) Allowing the Class Actions to Proceed Against Non-Debtor Parties [[D.I. 418](#); 11/10/25]

Objection Deadline: October 15, 2025 at 4:00 p.m. (ET), as extended for the Debtors

Objections/Informal Responses: None to date.

Status: The parties have reached an agreement in principle resolving this matter and anticipate submitting an agreed form of order under certification of counsel in the near term. By agreement of the parties, this matter has been adjourned to a date and time to be determined.

2. Debtors' Second Motion for an Order Extending the Period within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 [[D.I. 565](#); 1/29/26]

Related Pleadings:

- a) Certificate of No Objection [[D.I. 574](#); 2/6/26]
- b) Order Extending the Period within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 [[D.I. 577](#); 2/9/26]

Objection Deadline: February 5, 2026 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

Status: An order has been entered by the Court. No hearing is necessary.

**MATTER GOING FORWARD**

3. Confirmation of: Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [[D.I. 404](#); 11/5/25]

Related Pleadings:

- a) 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 [[D.I. 400](#); 11/4/25]

- b) Disclosure Statement for the Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [[D.I. 405](#); 11/5/25]
- c) 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 [[D.I. 406](#); 11/5/25]
- d) Certificate of Service re: Solicitation Materials Served on November 7, 2025 [[D.I. 427](#); 11/13/25]
- e) 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 [[D.I. 430](#); 11/14/25]
- f) Stipulation By and Among the Debtors and (I) TVT Capital Source, LLC (II) Insta Funding, LLC, (III) Pinnacle Business Funding LLC, and (IV) White Star Funding Inc. d/b/a TVT Cap with Respect to Claim Numbers 253-254, 264-271, and 273-282, in the Chapter 11 Cases [[D.I. 458](#); 12/1/25]
- g) Notice of Filing of Plan Supplement [[D.I. 459](#); 12/1/25]
- h) Supplemental Certificate of Service re: Solicitation Materials Served on December 1, 2025 [[D.I. 469](#); 12/10/25]
- i) Notice of Adjourned (I) Hearing to Consider Final Approval of the Disclosure Statement and Confirmation of the Debtors' Chapter 11 Plan and Related Voting and Objection Deadlines and (II) Related Deadlines [[D.I. 480](#); 12/15/25]
- j) 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 [[D.I. 486](#); 12/16/25]
- k) Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order Confirming Amended Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [[D.I. 527](#); 1/13/26]
- l) Statement and Joinder of the Official Committee of Unsecured Creditors in Support of Confirmation of the Debtors' Joint Chapter 11 Plan of Liquidation [[D.I. 530](#); 1/14/26]
- m) Debtors' Memorandum of Law in Support of Approval of the Disclosure Statement on a Final Basis and Confirmation of the Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [[D.I. 531](#); 1/14/26]

- n) Declaration of Jeffrey Gasbarra in Support of Approval of the Disclosure Statement on a Final Basis and Confirmation of the Joint Chapter 11 Plan of AGDP Holding Inc. and Its Affiliated Debtors [[D.I. 532](#); 1/14/26]
- o) Notice of Filing of Amended Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [[D.I. 533](#); 1/15/26]
- p) Notice of Withdrawal of Statement and Joinder of the Official Committee of Unsecured Creditors in Support of Confirmation of the Debtors' Joint Chapter 11 Plan of Liquidation [[D.I. 560](#); 1/27/26]
- q) Statement of the Committee with Respect to Withdrawal of Statement and Joinder of the Official Committee of Unsecured Creditors in Support of Confirmation of the Debtors' Joint Chapter 11 Plan of Liquidation [D.I. 561; 1/27/26 (*Sealed Version*) and [D.I. 562](#); 1/27/26 (*Redacted Version*)]
- r) Notice of (I) Agreement in Principle Resolving All Chapter 11 Plan, Sale, and CVR Motion Issues Between the Debtors, Committee, and Axar Parties, and (II) Withdrawal of the (A) Purchaser's CVR Motion, and (B) the Committee's Response to the CVR Motion and Withdrawal of Support for the Debtor's Chapter 11 Plan [[D.I. 570](#); 2/2/26]
- s) Notice of Filing of Amended Plan Supplement [[D.I. 575](#); 2/9/26]
- t) Notice of Filing of Revised Findings of Fact, Conclusions of Law, and Order Approving the Disclosure Statement on a Final Basis and Confirming the Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [[D.I. 576](#); 2/9/26]

Objection Deadline: December 8, 2025 at 4:00 p.m. (ET), as extended for the TVT Parties to January 12, 2026

Objections/Informal Responses:

- u) White Star Funding d/b/a TVT Cap's (I) Objection with Respect to Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors, and (II) Joinder to Objection of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Joint Chapter 11 Plan of Liquidation [[D.I. 524](#); 1/12/26]
- v) MCA Funders' (I) Objection to Debtors' Plan of Liquidation, and (II) Joinder to White Star Funding d/b/a TVT Cap's Objection to Debtors' Plan of Liquidation [[D.I. 525](#); 1/12/26]
- w) Informal Response from the Office of the United States Trustee
- x) Informal Response from the Official Committee of Unsecured Creditors

**Additional Pleadings:**

- y) **Notice of Filing of Further Revised Findings of Fact, Conclusions of Law, and Order Approving the Disclosure Statement on a Final Basis and Confirming the Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [D.I. 581; 2/11/26]**
- z) **Notice of Filing of Second Amended Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors [D.I. 583; 2/11/26]**

Status: As stated in the Notice filed at D.I. 570, the Global Settlement Parties have reached consensus regarding the Global Settlement and confirmation of the Debtors' chapter 11 plan. **Accordingly, the Global Settlement Parties have filed a second amended plan, listed as Agenda Item (z).** Moreover, the Debtors and the TVT Parties have resolved the TVT Parties' objections through a reservation of rights related to the adversary proceeding styled *AGDP Holding Inc. v. TVT Capital Source LLC*, Adv. P. No. 25-51803 (MFW), **which reservation has been included in the further revised form of confirmation order listed as Agenda Item (y).** This matter is going forward.

Dated: February 11, 2026  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

*/s/ S. Alexander Faris*

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