

**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)

Ref. Docket No. 619

**SUPPLEMENT TO SECOND 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 *Second Interim Fee Application of Young Conaway Stargatt & Taylor, LLP* [D.I. 619] (the “Second Interim Application”) for the period from November 1, 2025 through February 12, 2026 (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 Second Interim Application are not more than 10% higher than the fees budgeted in the budget provided by Young Conaway to the Debtors for the Application Period.

<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.



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- c. The professionals included in the Second Interim Application did not vary their hourly rate based on the geographic location of the bankruptcy cases.
- d. The Second 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 Second Interim Application includes approximately 11.20 hours with a value of \$12,320.00 spent by Young Conaway to ensure that the time entries subject to the Second 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 Second Interim Application includes rate increases as of January 1, 2026, as reflected in that certain *Notice of Annual Rate Increase of Young Conaway Stargatt & Taylor, LLP* [D.I. 487].

Dated: March 11, 2026  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

*/s/ S. Alexander Faris*

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Edmon L. Morton (No. 3856)  
Sean M. Beach (No. 4070)  
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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 <sup>1</sup>	Billed Firm-wide for preceding calendar year <sup>2</sup>	Billed This Application
Partner	\$971	\$998	\$1,285
Counsel	\$773	\$685	\$875
Associate	\$551	\$542	\$647
Paralegal	\$359	\$235	\$379
Aggregated:	\$715	\$705	\$866

<sup>1</sup> 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.

<sup>2</sup> 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 SECOND INTERIM APPLICATION**

<b>Name</b>	<b>Title</b>	<b>Department</b>	<b>Date of First Admission</b>	<b>Fees Billed in the Application Period (\$)</b>	<b>Hours Billed in the Application Period</b>	<b>Hourly Rate Billed in the Application Period (\$)</b>
Craig D. Grear	Partner	Business Planning & Tax	1990	4,200.00	2.80	1,500.00
				8,415.00	5.10	1,650.00
Edmon L. Morton	Partner	Bankruptcy	1999	84,753.00	65.70	1,290.00
				96,945.00	69.00	1,405.00
Sean M. Beach	Partner	Bankruptcy	2001	133,256.50	107.90	1,235.00
				195,966.50	145.70	1,345.00
Kevin A. Guerke	Partner	Bankruptcy	2001	85,956.00	74.10	1,160.00
				44,577.00	35.10	1,270.00
Kenneth J. Enos	Partner	Bankruptcy	2004	20,747.50	19.30	1,075.00
				6,227.50	5.30	1,175.00
Amanda Pooler	Counsel	Bankruptcy	2013	1,312.50	1.50	875.00
S. Alexander Faris	Associate	Bankruptcy	2016	169,128.00	234.90	720.00
				128,166.00	156.30	820.00
Andrew M. Lee	Associate	Bankruptcy	2022	14,006.50	25.70	545.00
				1,870.50	2.90	645.00
Rena P. Pagano	Associate	Bankruptcy	2022	53,636.00	101.20	530.00
				26,019.00	41.30	630.00
Emily K. Cowan	Associate	Business Planning & Tax	2023	1,957.00	3.80	515.00
				4,305.00	7.00	615.00
Sarah Gawrysiak	Associate	Bankruptcy	2024	51,450.00	102.90	500.00
				41,880.00	69.80	600.00
Evan S. Saruk	Associate	Bankruptcy	2025	22,150.00	44.30	500.00
				35,700.00	59.50	600.00
Eric A. Lovetri	Associate	Bankruptcy	2025	291.00	0.60	485.00
				1,228.50	2.10	585.00
Katherine Majewski	Associate	Bankruptcy	2025	1,228.50	2.10	585.00
Debbie Laskin	Paralegal	Bankruptcy	N/A	164.00	0.40	410.00
Troy Bollman	Paralegal	Bankruptcy	N/A	15,092.00	39.20	385.00
				11,160.00	27.90	400.00

Chad A. Corazza	Paralegal	Bankruptcy	N/A	38.50	0.10	385.00
Hubert T. Hannagan, III	Paralegal	Bankruptcy	N/A	192.50	0.50	385.00
Monica Fratticci	Paralegal	Litigation	N/A	337.50	1.50	225.00
Patrick M. Foss	Paralegal	Litigation	N/A	752.50	3.50	215.00
<b>Totals</b>				<b>1,263,109.50</b>	<b>1,459.00</b>	

**EXHIBIT C****BUDGET AND STAFFING PLAN**

<b>Project Category</b>	<b>Estimated Hours</b>	<b>Estimated Fees</b>
Case Administration (B001)	21.50	\$16,970.95
Court Hearings (B002)	64.50	\$50,912.85
Cash Collateral/DIP Financing (B003)	64.50	\$50,912.85
Schedules & Statements, U.S. Trustee Reports (B004)	21.50	\$16,970.95
Lease/Executory Contract Issues (B005)	107.50	\$84,854.75
Use, Sale or Lease of Property (363 issues) (B006)	128.90	\$101,825.70
Claims Analysis, Objections and Resolutions (B007)	128.90	\$101,825.70
Meetings (B008)	171.90	\$135,767.60
Stay Relief Matters (B009)	21.50	\$16,970.95
Reclamation Claims and Reclamation Adversaries (B010)	21.50	\$16,970.95
Other Adversary Proceedings (B011)	537.30	\$424,273.75
Plan and Disclosure Statement (B012)	580.20	\$458,215.65
Creditor Inquiries (B013)	21.50	\$16,970.95
General Corporate Matters (B014)	86.00	\$67,883.80
Employee Matters (B015)	21.50	\$16,970.95
Asset Analysis (B016)	21.50	\$16,970.95
Retention of Professionals/Fee Issues (B017)	43.00	\$33,941.90
Fee Application Preparation (B018)	43.00	\$33,941.90
Travel (B019)	0.00	\$0.00
Utility Services (B020)	21.50	\$16,970.95
Other Contested Matters (B190)	21.50	\$16,970.95
<b>Totals</b>	<b>2,149.20</b>	<b>\$1,697,095.00</b>

<b>STAFFING PLAN</b>		
<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Work on the Matter During the Budgeted Period</b>	<b>Average Rate<sup>1</sup></b>
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

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<sup>1</sup> 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**

<b>SUMMARY OF COMPENSATION BY PROJECT CATEGORY</b>		
<b>Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought (\$)</b>
Case Administration (B001)	17.80	9,130.00
Court Hearings (B002)	37.30	23,397.00
Cash Collateral/DIP Financing (B003)	45.30	43,547.00
Schedules & Statements, U.S. Trustee Reports (B004)	15.50	9,339.50
Lease/Executory Contract Issues (B005)	47.40	31,378.50
Use, Sale, or Lease of Property (363 issues) (B006)	73.30	74,090.50
Claims Analysis, Objections and Resolutions (B007)	105.90	77,396.00
Meetings (B008)	112.90	108,961.00
Stay Relief Matters (B009)	30.50	18,470.00
Other Adversary Matters (B011)	410.30	367,376.50
Plan and Disclosure Statement (B012)	424.70	392,618.50
Creditor Inquiries (B013)	2.10	1,880.00
General Corporate Matters (B014)	71.10	63,130.00
Employee Matters (B015)	1.70	1,462.50
Retention of Professionals/Fee Issues (B017)	38.70	21,587.00
Fee Application Preparation (B018)	24.50	19,345.50
<b>Totals</b>	<b>1,459.00</b>	<b>1,263,109.50</b>

<b>SUMMARY OF EXPENSE REIMBURSEMENTS</b>	
	<b>Amount (\$)</b>
AP Outside Duplication Svcs	15.89
Computerized Legal Research – Lexis	78.74
Computerized Legal Research – Westlaw	5,598.35
Delivery/Courier	36.00
Deposition/Transcript	3,402.55
Docket Retrieval/Search	228.10
Outside Litigation Support	5,717.70
Postage	55.20
Reproduction Charges	906.80
Working Meals	1,394.79
<b>Total</b>	<b>17,434.12</b>

**EXHIBIT E**

<b>SUMMARY OF SECOND INTERIM APPLICATION</b>	
Name of Applicant	Young Conaway Stargatt & Taylor, LLP
Name of Client	Debtor and Debtor in Possession
Time period covered by Second Interim Application	November 1, 2025 through February 12, 2026
Total compensation sought during the Application Period	\$1,263,109.50
Total expenses sought during the Application Period	\$17,434.12
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	\$3,442,908.00
Total expenses approved by interim order to date	\$18,135.75
Total allowed compensation paid to date	\$3,442,908.00
Total allowed expenses paid to date	\$18,135.75
Blended rate in the Second Interim Application for all attorneys	\$891.39
Blended rate in the Second Interim Application for all timekeepers	\$865.74
Compensation sought in the Second Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$526,533.60
Expenses sought in the Second Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$11,660.25
Number of professionals included in the Second Interim Application	20
If applicable, number of professionals in the Second Interim Application not included in staffing plan approved by client	13
If applicable, difference between fees budgeted and compensation sought during the Application Period	Amount Budgeted: \$1,700,000.00 Amount Sought: \$1,263,109.50 Difference: \$436,890.50
Number of professionals billing fewer than 15 hours to the case during the Application Period	10
Are any rates higher than those approved or disclosed at retention?	Yes. See D.I. 487.