

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

In re: AGDP HOLDING INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 25-11446 (MFW) (Jointly Administered) Obj. Deadline: April 6, 2026 at 4:00 p.m. (ET) Hearing Date: April 23, 2026 at 11:30 a.m. (ET)
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**SUMMARY OF SECOND INTERIM APPLICATION OF MORRIS JAMES LLP,
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH JANUARY 31, 2026**

Name of Applicant	<u>Morris James LLP</u>
Authorized to provide professional services to:	<u>Official Committee of Unsecured Creditors of AGDP holding Inc., et al.</u>
Date of retention order:	<u>October 1, 2025 effective as of August 20, 2025</u>
Period for which compensation and reimbursement sought:	<u>November 1, 2025 through January 31, 2026</u>
Compensation sought as actual, reasonable, and necessary:	<u>\$91,134.50</u>
Expense reimbursement sought as actual, reasonable, and necessary:	<u>\$974.77</u>
This is a(n):	<u> </u> monthly <u> X </u> interim <u> </u> final

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.



Previous Applications:

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Fees Requested	Total Expenses Requested	CNO Filing Date & Docket No.	Amount of Fees Authorized to be Paid	Amount of Expenses Authorized to be Paid
10/22/2025 [D.I. 357]	August 20, 2025 – September 30, 2025	\$144,093.50	\$693.02	11/6/2025 [D.I. 409]	\$144,093.50	\$693.02
11/10/2025 [D.I. 420]	October 1, 2025 – October 31, 2025	\$79,772.00	\$187.63	11/25/2025 [D.I. 449]	\$79,772.00	\$187.63
12/11/2025 [D.I. 474]	November 1, 2025 – November 30, 2025	\$23,404.50	\$875.14	12/29/2025 [D.I. 512]	\$18,723.60	\$875.14
2/24/2026 [D.I. 609]	December 1, 2025 – January 31, 2026	\$67,730.00	\$99.63	3/11/2026 [D.I. 629]	\$54,184.00	\$99.63
TOTALS		\$315,000.00	\$1,855.42		\$296,773.10	\$1,855.42

**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)

Obj. Deadline: April 6, 2026 at 4:00 p.m. (ET)

Hearing Date: April 23, 2026 at 11:30 a.m. (ET)

**SECOND INTERIM APPLICATION OF MORRIS JAMES LLP,
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH JANUARY 31, 2026**

Morris James LLP (“Morris James”), co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) of AGDP Holding Inc., *et al.*, the above-captioned Debtors (the “Debtors”), hereby submits its *Second Interim Application of Morris James LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025 through January 31, 2026* (the “Application”) for entry of an order pursuant to section 331 of title 11 of the United States Code, 11 U.S.C. §§101 et seq, as amended (the “Bankruptcy Code”) for allowance of compensation in the amount of \$91,134.50 and reimbursement of expenses in the amount of \$974.77 for the period November 1, 2025 through January 31, 2026 (the “Interim Compensation Period”), in support thereof, Morris James respectfully represents as follows:

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.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (B).

2. Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§1408 and 1409.

3. The statutory predicate for the relief sought herein is sections 1103 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

BACKGROUND

4. On August 4, 2025, (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively the “Chapter 11 Cases”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

5. The Debtors have continued in the possession of its property and has continued to operate and manage its business as Debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On August 18, 2025, the United States Trustee for the District of Delaware (the “United States Trustee”) filed its *Notice of Appointment* [Docket No. 73] of the seven (7) member Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. On August 19, 2025, the Committee selected Orrick, Herrington & Sutcliffe LLP as its lead counsel. On August 20, 2025, Morris James was selected as its Delaware counsel and IslandDundon LLC was selected as the Committee’s financial advisor.

7. On August 21, 2025, the Debtors filed its *Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of*

Professionals, and (II) Granting Related Relief (the “Interim Compensation Motion”) [Docket No. 90], and on September 2, 2025, the Court entered an Order approving the Interim Compensation Motion (the “Interim Compensation Order”) [Docket No. 132].

8. On September 15, 2025, the Committee filed the *Application for Entry of an Order Authorizing the Retention and Employment of Morris James LLP as Co-Counsel to the Official Committee of Unsecured Creditors Effective as of August 20, 2025* (the “Retention Application”) [Docket No 193]. On October 1, 2025, the Court entered an order approving the Retention Application, effective as of August 20, 2025 [Docket No. 257].

SERVICES PROVIDED BY MORRIS JAMES

9. Since its retention, Morris James, in its capacity as co-counsel to the Committee, undertook the following:

- Provided legal advice and assistance to the Committee in its consultation with the Debtors relative to the Debtors’ administration of its reorganization and the Chapter 11 Cases;
- Reviewed and analyzed all applications, motions, orders, statements of operations, and schedules filed with the Court by the Debtors or third parties, advised the Committee as to their propriety, and after consultation with the Committee, took appropriate action;
- Prepared necessary applications, motions, responses, answers, orders, reports, and other legal papers on behalf of the Committee;
- Represented the Committee at hearings held before the Court and communicated with the Committee regarding the issues raised, as well as the decisions of the Court; and
- Performed such other legal services to the Committee in connection with the prosecution of the Chapter 11 Cases as are necessary and appropriate.

MONTHLY APPLICATIONS

10. On December 11, 2025, Morris James filed its third monthly application for compensation and reimbursement of expenses [Docket No. 474] (the “Third Monthly Application”). By the Third Monthly Application, Morris James sought approval of compensation of \$23,404.50 and reimbursement of expenses in the amount of \$875.14 for the period of November 1, 2025 through November 30, 2025. On December 29, 2025, Morris James filed a certificate of no objection regarding the Third Monthly Application [Docket No. 512].

11. On February 24, 2026, Morris James filed its fourth monthly application for compensation and reimbursement of expenses [Docket No. 609] (the “Fourth Monthly Application”). By the Fourth Monthly Application, Morris James sought approval of compensation of \$67,730.00 and reimbursement of expenses in the amount of \$99.63 for the period of December 1, 2025 through January 31, 2026. On March 11, 2026, Morris James filed a certificate of no objection regarding the Fourth Monthly Application [Docket No. 629].

12. The total sum due to Morris James for professional services rendered on behalf of the Committee during the Interim Compensation Period is \$91,134.50. A chart detailing the fees during, by professional and by category rendered during the Interim Compensation Period, by each professional and paraprofessional at Morris James are both attached as **Exhibit A**.

13. Morris James submits that the professional services rendered on behalf of the Committee during this time were both reasonable and necessary.

14. Morris James incurred \$974.77 of expenses during the Interim Compensation Period. A chart detailing the specific disbursements is attached hereto as **Exhibit B**.

15. In accordance with the United States Trustee Large Case Fee Guidelines (“Fee Guidelines”), Morris James has attached the Answers to Questions C.5 of the Fee

Guidelines, Customary and Comparable Compensation Disclosures and the Budget and Staffing Plan as **Exhibit C**.

16. The undersigned hereby attests that he has reviewed the requirements of Local Rule 2016-1, and this Application conforms to such requirements, including that travel time was not billed at more than half rate and copying charges were only \$0.10 per page.

WHEREFORE, Morris James hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (i) approval of allowance and payment on an interim basis, of Morris James' compensation necessary and valuable professional services rendered to the Committee in the sum of \$91,134.50 and reimbursement of expenses in the sum of \$974.77 for the period November 1, 2025 through and including January 31, 2026; (ii) payment of any 20% holdback that was withheld from payment under the monthly fee application; and (iii) such other and further relief as is just and proper.

Dated: March 20, 2026

MORRIS JAMES LLP

/s/ Eric J. Monzo

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*Counsel to the Official Committee of Unsecured
Creditors*

**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)

Obj. Deadline: April 6, 2026 at 4:00 p.m. (ET)

Hearing Date: April 23, 2026 at 11:30 a.m. (ET)

**NOTICE OF SECOND INTERIM APPLICATION OF MORRIS JAMES LLP,
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH JANUARY 31, 2026**

PLEASE TAKE NOTICE that on March 20, 2026, Morris James LLP, co-counsel to the Official Committee of Unsecured Creditors appointed in the above-referenced bankruptcy cases (the “Committee”), pursuant to the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 132], filed its second interim fee application (“Application”) seeking allowance of fees in the amount of \$91,134.50 and reimbursement of expenses in the amount of \$974.77 for the period from November 1, 2025 through January 31, 2026 (the “Interim Compensation Period”) with United States Bankruptcy Court for the District of the Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that if you object to the relief sought by the Application, you are required to file a response to the Application, on or before **April 6, 2026 at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the response upon Committee’s undersigned counsel.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Application will be held on **April 23, 2026 at 11:30 a.m. (ET)** before the Honorable Mary F. Walrath, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor Courtroom No. 4, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN ALL FEES AND EXPENSES REQUESTED IN THE APPLICATION, INCLUDING ANY 20% HOLDBACK, MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.

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.

Dated: March 20, 2026

MORRIS JAMES LLP

/s/ Eric J. Monzo

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*Counsel to the Official Committee of Unsecured
Creditors*

EXHIBIT A**Compensation By Category – Second interim Compensation Period**

	Third Monthly Application		Fourth Monthly Application		Total	
	Hours	Amount	Hours	Amount	Hours	Amount
B110 Case Administration	7.50	\$5,437.00	13.60	\$10,617.50	21.10	\$16,054.50
B140 Relief from Stay/Adequate Protection Proceedings	-	-	0.30	\$307.50	0.30	\$307.50
B150 Meetings/Communications with Committee and/or Creditors	4.50	\$3,667.50	10.30	\$9,752.00	14.80	\$13,419.50
B160 Retention Applications (MJ)	-	-	0.50	\$192.50	0.50	\$192.50
B165 Retention Applications (Others)	-	-	0.90	\$579.00	0.90	\$579.00
B170 Fee Applications (MJ)	6.80	\$3,414.00	4.90	\$3,070.50	11.70	\$6,484.50
B175 Fee Applications (Others)	10.50	\$6,492.50	8.80	\$5,274.50	19.30	\$11,767.00
B185 Assumption/Rejection of Leases and Contracts	0.50	\$308.50	-	-	0.50	\$308.50
B196 Litigation	0.20	\$85.00	2.70	\$2,248.50	2.90	\$2,333.50
B230 Financing/Cash Collateral	-	-	0.20	\$205.00	0.20	\$205.00
B310 Claims Administration and Objections	0.60	\$447.00	1.20	\$782.00	1.80	\$1,229.00
B320 Plan and Disclosure Statement	3.90	\$3,281.50	46.90	\$34,212.50	50.80	\$37,494.00
B430A Court Hearings: Attendance and Preparation	0.30	\$271.50	0.50	\$488.50	0.80	\$760.00
Total	34.80	\$23,404.50	90.80	\$67,730.00	125.60	\$91,134.50

Timekeeper Summary – Second interim Compensation Period

Timekeeper	Position	Third Monthly Application		Fourth Monthly Application		Total	
		Hours	Amount	Hours	Amount	Hours	Amount
Eric J. Monzo	Member of the Delaware Bar since 2008; Partner in Bankruptcy Department since 2014	7.10	\$6,425.50	16.90	\$17,154.50	24.00	\$23,580.00
Brya M. Keilson	Member of the Delaware Bar since 2005; Partner in Bankruptcy Department since 2019	13.30	\$11,305.00	39.00	\$35,610.00	52.30	\$46,915.00
Jason S. Levin	Member of the Delaware Bar since 2017; Associate in Bankruptcy Department since 2020	0.50	\$262.50	3.50	\$1,960.00	4.00	\$2,222.50
Siena B. Cerra	Member of the Delaware Bar since 2023; Associate in Bankruptcy Department since 2023	1.50	\$637.50	0.50	\$225.00	2.00	\$862.50
Stephanie A. Lisko	Paralegal in Bankruptcy Department since 2020	2.30	\$885.50	8.40	\$2,518	10.70	\$3,403.50
Douglas J. Depta	Paralegal in Bankruptcy Department since 2020	10.10	\$3,888.50	12.80	\$5,140.00	22.90	\$9,028.50
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2025	-	-	9.70	\$4,122.50	9.70	\$4,122.50
Total		34.80	\$23,404.50	90.80	\$67,730.00	125.60	\$91,134.50

EXHIBIT B**Summary of Expenses – Second interim Compensation Period**

	Third Monthly Application	Fourth Monthly Application	Total
Postage	\$3.84	\$4.63	\$8.47
Reproduction	\$18.70	\$6.40	\$25.10
Reliable (Transcript)	\$852.60	-	\$852.60
Pacer	-	\$88.60	\$88.60
TOTAL:	\$875.14	\$99.63	\$974.77

EXHIBIT C

EXHIBIT C-1**BUDGET**

PROJECT CATEGORY	ESTIMATED HOURS	ESTIMATED FEES
Asset Analysis and Recovery		
Asset Disposition		
Assumption and Rejection of Leases and Contracts	5	\$2,000
Avoidance Action Analysis		
Budgeting (Case)		
Business Operations		
Case Administration	40	\$30,000
Claims Administration and Objections	5	\$2,000
Corporate Governance and Board Matters		
Court Hearings: Attendance and Preparation	5	\$2,000
Employee Benefits and Pensions		
Employment and Fee Applications	40	\$20,000
Employment and Fee Application Objections		
Financing and Cash Collateral	5	\$2,000
Litigation		
Meetings and Communications with Creditors	15	\$15,000
Non-Working Travel		
Other Contested Matters (excluding assumption/rejection motions)		
Plan and Disclosure Statement	30	\$25,000
Real Estate		
Relief from Stay and Adequate Protection	5	\$2,000
Reporting		
Tax		
Valuation		
TOTAL	150	\$100,000

EXHIBIT C-2
STAFFING PLAN

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE BUDGET PERIOD	AVERAGE HOURLY RATE
Sr./Equity Partner/Shareholder	2	\$926.25
Jr./Non-equity/Income Partner		
Counsel		
Sr. Associate (7 or more years since first admission)	1	\$542.50
Associate (4-6 years since first admission)		
Jr. Associate (1- 3 years since first admission)	1	\$437.50
Staff Attorney		
Contract Attorney		
Paralegal	3	\$405.00
Law Clerk		
Case Manager		

ANSWERS TO QUESTIONS SET FORTH IN ¶ C.5 OF THE APPX. B GUIDELINES

<u>Question</u>	<u>Answer</u>
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	No.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	No.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No.
<p>If the fee application includes any rate increases since retention:</p> <p>Did your client review and approve those rate increases in advance?</p> <p>Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?</p>	The Application includes the Morris James' standard yearly rate increases for 2026. Morris James' hourly rates are consistent with the rates charged by other firms rendering comparable services. Morris James filed the Notice of Annual Rate Increase of Morris James LLP with the Court [Docket No.489].

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

Morris James' hourly rates for bankruptcy services are comparable or less than the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Morris James' hourly rates for bankruptcy services are comparable to the rates charged by the firm, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required.

Category of Timekeeper (as maintained by the Firm)	Blended Hourly Rate ¹		
	Billed firm-wide other than for bankruptcy and personal injury for February 1, 2025 through January 31, 2026 ²	Billed for Morris James' National Practices other than bankruptcy only for February 1, 2025 through January 31, 2026 ³	Billed Through Interim Period
Partner	\$808.27	\$897.99	\$923.92
Associate ⁴	\$430.07	\$460.56	\$514.17
Paralegal	\$293.19	\$328.23	\$405.00
Aggregate:	\$599.94	\$706.45	\$717.63

¹ Consistent with ¶ C.3 of the Appendix B Guidelines, the blended hourly rates set forth herein are calculated by dividing the dollar value of hours billed by the number of hours billed for the relevant timekeepers during the applicable time period. The data for the "preceding year" is based on information from Morris James' financial information for the period of February 1, 2025 through January 31, 2026.

² Please note that this column does not include the rates of the firm's personal injury attorneys, each of whom bill on a contingency basis.

³ This column does not include Morris James' "local practices" (e.g., labor law, matrimonial, medical malpractice, real estate, and tax and estates).

⁴ The "associate" category of timekeepers also includes senior counsel.

am thoroughly familiar with all other work performed on behalf of the Committee by the attorneys and paraprofessionals in Morris James.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and Section 504 of the Title 11, United States Code, no agreement or understanding exists between Morris James and any other person for the sharing of compensation to be received in connection with the above-captioned case.

4. I have reviewed the requirements of Local Rule 2016-1 of the United States Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and belief, this Application complies with Local Rule 2016-1.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 20, 2026

/s/ Eric J. Monzo
Eric J. Monzo (DE Bar No. 5214)

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In re:

AGDP HOLDING INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11446 (MFW)

(Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of March, 2026, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the *Second Interim Application of Morris James LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period From November 1, 2025 through January 31, 2026* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and an additional service was completed via electronic mail or first class mail on the parties listed on the attached service list.

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)

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Service List

AGDP Holdings INC.
Attn: General Counsel
140 Stewart Ave
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*Administrative agent and collateral agent
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United States Trustee