

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)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 22, 2025 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 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. Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [(SEALED) D.I. 149; 9/7/25, and (Redacted) [D.I. 150](#); 9/7/25]

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 Amended items appear in bold.



Related Pleadings:

- a) Declaration of Joshua Nahas in Support of Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors' (I) DIP Motion and (II) Sale Motion, and Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [(SEALED) D.I. 151; 9/7/25, and (Redacted) D.I. TBD]
- b) Declaration of Brandon Batzel in Support of Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors' (I) DIP Motion and (II) Sale Motion, and Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [(SEALED) D.I. 152; 9/7/25, and (Redacted) [D.I. 153](#); 9/7/25]
- c) Order Denying in Part and Granting in Part Based on Party Consent the Motion of Official Committee of Unsecured Creditors for an Order (A) Adjourning the Hearing on the Debtors' (I) DIP Motion and (II) Sale Motion or, Alternatively, (B) Shortening the Notice and Objection Periods for, and Scheduling an Expedited Hearing on the Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [[D.I. 177](#); 9/11/25]
- d) Notice of Hearing on Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [[D.I. 179](#); 9/11/25]
- e) Notice of Filing of Global Settlement Term Sheet [[D.I. 206](#); 9/18/25]

Objection Deadline: September 23, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

Status: This matter has been resolved pursuant to the settlement agreement filed at D.I. 262. As such, no hearing is necessary.

- 2. Debtors' Motion for Entry of an Order Authorizing (I) Rejection of Certain Executory Contracts, in Each Case, Effective as of the Rejection Date; and (II) Granting Related Relief [[D.I. 239](#); 9/30/25]

Related Pleadings:

- a) Certificate of No Objection [[D.I. 315](#); 10/15/25]
- b) Order Authorizing (I) Rejection of Certain Executory Contracts, in Each Case, Effective as of the Rejection Date; and (II) Granting Related Relief [[D.I. 320](#); 10/16/25]

Objection Deadline: October 14, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

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

3. 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]

Related Pleadings: None.

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

Objections/Informal Responses: None to date.

Status: By agreement of the parties, this matter is adjourned to a date and time to be determined. The movants have extended the Debtors' deadline to object to this motion to seven (7) days prior to the hearing at which this motion will go forward.

MATTERS GOING FORWARD

4. Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 12](#); 8/4/25]

Related Pleadings:

- a) Declaration of Stephen Golmont in Support of Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 14](#); 8/4/25]

- b) Declaration of Jeffrey Gasbarra in Support of Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 15](#); 8/4/25]
- c) Notice of Filing of Agency Fee Letter [(SEALED) D.I. 17, 8/4/25; (Redacted) [D.I. 18](#), 8/4/25]
- d) Interim Order [[D.I. 46](#); 8/5/25]
- e) Omnibus Notice of First Day Motions and Final Hearing Thereon [[D.I. 48](#); 8/6/25]
- f) Second Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 128](#); 9/2/25]
- g) Notice of Filing of Proposed Final DIP Order [[D.I. 147](#); 9/5/25]
- h) Third Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 176](#); 9/11/25]
- i) Notice of Filing of Global Settlement Term Sheet [[D.I. 206](#); 9/18/25]
- j) Fourth Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 259](#); 10/1/25]
- k) Notice of Filing of Proposed Final DIP Order [[D.I. 316](#); 10/15/25]

- l) Reply of AG Acquisition 1 LLC to the Objections of the TVT Parties to (1) the DIP Motion and (2) the Global Settlement [[D.I. 324](#); 10/17/25]
- m) Debtors' Omnibus Reply in Support of the Debtors' (I) Motion to Obtain Postpetition Financing and Use of Cash Collateral and (II) Motion to Approve Global Settlement [[D.I. 330](#); 10/20/25]
- n) Debtors' Motion for Entry of an Order Granting the Debtors Leave and Permission to File Late Reply in Support of Debtors' (I) DIP Motion and (II) 9019 Motion [[D.I. 331](#); 10/20/25]

Objection Deadline: August 28, 2025 at 4:00 p.m. (ET), as extended to September 7, 2025 for the Official Committee of Unsecured Creditors

Objections/Informal Responses:

- o) Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors' (I) DIP Motion and (II) Sale Motion, and Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [(SEALED) D.I. 149; 9/7/25, and (Redacted) [D.I. 150](#); 9/7/25]
- p) Declaration of Joshua Nahas in Support of Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors' (I) DIP Motion and (II) Sale Motion, and Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [(SEALED) D.I. 151; 9/7/25, and (Redacted) D.I. TBD]
- q) Declaration of Brandon Batzel in Support of Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors' (I) DIP Motion and (II) Sale Motion, and Cross-Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee [(SEALED) D.I. 152; 9/7/25, and (Redacted) [D.I. 153](#); 9/7/25]
- r) Limited Objection and Reservation of Rights of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Debtors' Motion Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code (I) Authorizing the Debtors to Obtain Senior Secured Super Priority Post Petition Financing; (II) Granting (A) Liens and Super Priority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 310](#); 10/15/25]

- s) White Star Funding Inc. d/b/a TVT Cap's Joinder to the Limited Objection and Reservation of Rights of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Debtors' Motion Pursuant to Sections 105, 361, 362, 363, 364, 503 and 507 of the Bankruptcy Code (I) Authorizing the Debtors to Obtain Senior Secured Super Priority Post Petition Financing; (II) Granting (A) Liens and Super Priority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[D.I. 312](#); 10/15/25]

Additional Pleadings:

- t) **Declaration of Jeffrey Gasbarra (I) in Support of the Debtors' Motion Pursuant to Sections 105 and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing Settlement By and Among the Debtors, Axar Capital Management LP, and the Official Committee of Unsecured Creditors and (II) in Further Support of the Debtors' DIP Motion [[D.I. 340](#); 10/21/25]**
- u) **Declaration of Pamela B. Corrie in Support of Debtors' (I) Motion to Obtain Postpetition Financing and Use of Cash Collateral and (II) Motion to Approve Global Settlement [[D.I. 341](#); 10/21/25]**

Debtors' Witnesses:

- i. Pamela B. Corrie
- ii. Jeffrey Gasbarra

Status: This matter has been resolved with respect to the objection of the Official Committee of Unsecured Creditors, listed at agenda item (o), pursuant to the settlement agreement filed at D.I. 262. With respect to the remaining responses listed at agenda items (r) and (s), this matter is going forward. The Debtors **have filed** declarations in support of this matter, **listed as agenda items (t) and (u)**, which declarations will serve as the witnesses' direct testimony.

- 5. Debtors' Motion for Entry of an Order (A) Approving Certain Bidding Procedures and the Form and Manner of Notice Thereof, (B) Authorizing the Debtors to Designate the Stalking Horse Bidder, (C) Scheduling an Auction and a Hearing on the Approval of the Sale of Some, All, or Substantially All of the Debtors' Assets, (D) Authorizing the Debtors to Enter Into the Purchase Agreement(s), (E) Establishing Certain Assumption and Assignment Procedures and Approving the Manner of Notice Thereof, and (F) Granting Related Relief; and (II) An Order or Orders (A) Authorizing the Sale of Some, All, or Substantially All of the Debtors' Assets Free and Clear of Encumbrances, (B) Approving

the Assumption and Assignment of the Potentially Assigned Contracts, and (C) Granting Related Relief [[D.I. 62](#); 8/14/25]

Related Pleadings:

- a) Declaration of Jason Cohen in Support of Debtors' Motion for Entry of (I) an Order (A) Approving Certain Bidding Procedures and the Form and Manner of Notice Thereof, (B) Authorizing the Debtors to Designate the Stalking Horse Bidder, (C) Scheduling an Auction and a Hearing on the Approval of the Sale of Some, All, or Substantially All of the Debtors' Assets, (D) Authorizing the Debtors to Enter into the Purchase Agreement(s), (E) Establishing Certain Assumption and Assignment Procedures and Approving the Manner of Notice Thereof, and (F) Granting Related Relief; and (II) an Order or Orders (A) Authorizing the Sale of Some, All, or Substantially All of the Debtors' Assets Free and Clear of Encumbrances, (B) Approving the Assumption and Assignment of the Potentially Assigned Contracts, and (C) Granting Related Relief [[D.I. 63](#); 8/14/25]
- b) Notice of Filing of Amendment to Stalking Horse APA [[D.I. 92](#); 8/22/25]
- c) Order (I) Approving Certain Bidding Procedures and the Form and Manner of Notice Thereof, (II) Authorizing the Debtors to Designate the Stalking Horse Bidder, (III) Scheduling an Auction and a Hearing on the Approval of the Sale of Some, All, or Substantially All of the Debtors' Assets, (IV) Authorizing the Debtors to Enter Into the Purchase Agreement(s), (V) Establishing Certain Assumption and Assignment Procedures and Approving the Manner of Notice Thereof, and (VI) Granting Related Relief [[D.I. 173](#); 9/11/25]
- d) Notice of Auction and Sale Hearing [[D.I. 200](#); 9/15/25]
- e) Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts [[D.I. 201](#); 9/15/25]
- f) Notice of Rescheduled Hearing [[D.I. 210](#); 9/22/25]
- g) Notice of Cancellation of Auction and Designation of Stalking Horse Bid as the Successful Bid [[D.I. 290](#); 10/10/25]
- h) Notice of Filing of Proposed Sale Order [[D.I. 326](#); 10/17/25]
- i) Notice of Filing of Amended and Restated Stalking Horse APA [[D.I. 328](#); 10/18/25]

Cure Objection Deadline: September 30, 2025 at 4:00 p.m. (ET)

Cure Objections/Informal Responses:

- j) Reservation of Rights to Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts Regarding Cure Amounts of Lease [[D.I. 333](#); 10/20/25]
- k) Informal response from DICE FM

Sale Objection Deadline: October 20, 2025 at 4:00 p.m. (ET)

Sale Objections/Informal Responses:

- l) **Objection of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Sale of the Debtors' Assets** [[D.I. 335](#); 10/20/25]
- m) **White Star Funding Inc. d/b/a TVT Cap's Joinder to the Objection of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Sale of the Debtors' Assets** [[D.I. 336](#); 10/20/25]

Additional Pleadings:

- n) **Declaration of Jason Cohen in Support of Proposed Order Authorizing (I) the Sale of the Debtors' Assets Free and Clear of All Lien and Claims; (II) the Debtors to Enter Into and Perform Their Obligations Under the Asset Purchase Agreement and Related Documents; (III) the Debtors to Assume and Assign Certain Contracts and Unexpired Leases; (IV) Waiver of the Stay Periods Under Bankruptcy Rules 6004(h) and 6006(d); and (V) Granting Related Relief** [[D.I. 338](#); 10/21/25]
- o) **Declaration of Pamela B. Corrie in Support of Proposed Order Authorizing (I) the Sale of the Debtors' Assets Free and Clear of All Lien and Claims; (II) the Debtors to Enter Into and Perform Their Obligations Under the Asset Purchase Agreement and Related Documents; (III) the Debtors to Assume and Assign Certain Contracts and Unexpired Leases; (IV) Waiver of the Stay Periods Under Bankruptcy Rules 6004(h) and 6006(d); and (V) Granting Related Relief** [[D.I. 339](#); 10/21/25]

Status: The Debtors **have filed** declarations in support of this matter, **listed as agenda items (n) and (o)**, and intend to file a revised form of order approving the Sale in advance of the hearing. This matter is going forward.

6. Debtors' Motion Pursuant to Sections 105 and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing Settlement By and Among the Debtors, Axar Capital Management LP, and the Official Committee of Unsecured Creditors [[D.I. 262](#); 10/1/25]

Related Pleadings:

- a) Notice of Filing of Global Settlement Term Sheet [[D.I. 206](#); 9/18/25]
- b) Reply of AG Acquisition 1 LLC to the Objections of the TVT Parties to (1) the DIP Motion and (2) the Global Settlement [[D.I. 324](#); 10/17/25]
- c) Reply of the Official Committee of Unsecured Creditors in Support of the Debtors' Motion to Approve Global Settlement [[D.I. 329](#); 10/20/25]
- d) Debtors' Omnibus Reply in Support of the Debtors' (I) Motion to Obtain Postpetition Financing and Use of Cash Collateral and (II) Motion to Approve Global Settlement [[D.I. 330](#); 10/20/25]
- e) Debtors' Motion for Entry of an Order Granting the Debtors Leave and Permission to File Late Reply in Support of Debtors' (I) DIP Motion and (II) 9019 Motion [[D.I. 331](#); 10/20/25]
- f) Motion of the Official Committee of Unsecured Creditors for Leave to File and Serve a Late Reply in Support of the Debtors' Motion to Approve Global Settlement [[D.I. 332](#); 10/20/25]

Objection Deadline: October 15, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- g) Objection of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Debtors' Motion Pursuant to Sections 105 and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing Settlement By and Among the Debtors, Axar Capital Management LP, and the Official Committee of Unsecured Creditors [(SEALED) D.I. 309; 10/15/25, and (Redacted) [D.I. 323](#); 10/17/25]
- h) White Star Funding Inc. d/b/a TVT Cap's Objection to Debtors' Motion Pursuant to Sections 105 and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing Settlement By and Among the Debtors, Axar Capital Management LP, and the Official Committee of Unsecured Creditors [[D.I. 311](#); 10/15/25]

Additional Pleadings:

- i) Declaration of Jeffrey Gasbarra (I) in Support of the Debtors' Motion Pursuant to Sections 105 and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing Settlement By and Among the Debtors, Axar Capital Management LP, and the Official Committee of Unsecured Creditors and (II) in Further Support of the Debtors' DIP Motion [[D.I. 340](#); 10/21/25]**
- j) Declaration of Pamela B. Corrie in Support of Debtors' (I) Motion to Obtain Postpetition Financing and Use of Cash Collateral and (II) Motion to Approve Global Settlement [[D.I. 341](#); 10/21/25]**

Debtors' Witnesses:

- i. Pamela B. Corrie
- ii. Jeffrey Gasbarra

Status: This matter is going forward. The Debtors **have filed** declarations in support of this matter, **listed as agenda items (i) and (j)**, which declarations will serve as the witnesses' direct testimony.

- 7. Motion for Entry of an Order Authorizing TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to File Under Seal Its Objection to Debtors' Motion Pursuant to Sections 105 and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving Settlement By and Among the Debtors, Axar Capital Management LP, and the Official Committee of Unsecured Creditors [[D.I. 322](#); 10/17/25]

Related Pleadings:

- a) Objection of TVT Capital Source LLC, Insta Funding LLC, and Pinnacle Business Funding LLC to Debtors' Motion Pursuant to Sections 105 and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing Settlement By and Among the Debtors, Axar Capital Management LP, and the Official Committee of Unsecured Creditors [(SEALED) D.I. 309; 10/15/25, and (Redacted) [D.I. 323](#); 10/17/25]

Objection Deadline: At the Hearing.

Objections/Informal Responses: None to date.

Status: This matter is going forward.

Dated: October 21, 2025
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ S. Alexander Faris

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