IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AGDP HOLDING INC., *et al.,*[1]	Case No. 25-11446 (MFW)
Debtors.	(Jointly Administered)
	Obj. Deadline: August 10, 2026 at 4:00 p.m. (ET) **Hearing Date: September 3, 2026 at 11:30 a.m. (ET)**

THE LIQUIDATING TRUSTEE'S FOURTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE TO FILE NOTICES TO REMOVE ACTIONS

Joshua Nahas as liquidating trustee ("Liquidating Trustee") of the Liquidating Trust (the "Liquidating Trust") of AGDP Holding Inc. and its affiliated Debtors (the "Debtors" and after the Effective Date, the "Post-Effective Date Debtors") pursuant to the *Second Amended Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors, dated February 11, 2026* (the "Plan") [Docket No. 583], by and through his undersigned counsel, files this motion (the "Motion") pursuant to 28 U.S.C. § 1452, rules 9006(b) and 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rule 9006-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") for entry of an order, substantially in the form attached as **Exhibit A** (the "Proposed Order"), approving the extension of the deadline by which the Liquidating Trustee may remove actions. In support of this Motion, the Liquidating Trustee states 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.

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RELIEF REQUESTED

1. Pursuant to Bankruptcy Rule 9027(a)(2), the time period by which the Liquidating Trustee may file notices of removal of claims and causes of action pursuant to 28 U.S.C. § 1452 is set to expire on November 3, 2025.[2] On April 27, 2026, the Debtors filed the *Debtors' Third Motion for an Order Extending the Period within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452* [Docket No. 676]. On May 13, 2026, the Bankruptcy Court entered an order approving this motion and extending the deadline to remove actions to August 3, 2026 ("Removal Deadline"). *See* Docket No. 693.

2. By this Motion, pursuant to 28 U.S.C. § 1452, Bankruptcy Rules 9006(b) and 9027, and Local Rule 9006-2, the Liquidating Trustee requests entry of an order extending the Removal Deadline by approximately 180 days, through and including February 1, 2027[3] with respect to all matters pending as of the Petition Date as specified in Bankruptcy Rule 9027(a)(2) (the "Prepetition Actions") in addition to any and all matters initiated after the Petition Date as specified in Bankruptcy Rule 9027(a)(3) (the "Postpetition Actions," together with the Prepetition Actions, the "Actions").[4]

3. The Liquidating Trustee further requests that the Order approving this Motion be entered without prejudice to (a) any position the Liquidating Trustee may take regarding whether section 362 of title 11 of the United States Code (the "Bankruptcy Code") applies to stay any given Action, and (b) the right of the Liquidating Trustee to seek further extensions of the Removal Deadline.

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[2] Bankruptcy Rule 9027(a)(2) provides that the time period will expire ninety (90) days from the Petition Date.

[3] One hundred and eighty days from the current Removal Deadline is Saturday, January 30, 2027. Accordingly, pursuant to Bankruptcy Rule 9006(a)(1)(C), the requested extension of the current Removal Deadline would be to Monday, February 1, 2027.

[4] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the Removal Deadline automatically extends such deadline until such time as the Court rules on this Motion.

JURISDICTION, VENUE, AND PREDICATES FOR RELIEF

4. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.). This is a core proceeding under 28 U.S.C. § 157(b). Venue of these Chapter 11 Cases (as defined below) and this Motion is proper in this District under 28 U.S.C. §§ 1408 and 1409.

5. The predicates for the relief requested by this Motion are 28 U.S.C. § 1452, section 105(a) of the Bankruptcy Code, Bankruptcy Rules 9006(b) and 9027, and Local Rule 9006-2.

6. Pursuant to Local Rule 9013-1(f), the Liquidating Trustee consents to the entry of a final judgment or order with respect to this Motion if it is determined that this Court lacks Article III jurisdiction to enter such final order or judgment absent consent of the parties.

BACKGROUND

7. On August 4, 2025 (the "Petition Date"), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases"). These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. The Post-Effective Date Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

8. On August 18, 2025, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed the official committee of unsecured creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code. [Docket No. 73].

9. Additional factual background and information regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the

commencement of these chapter 11 cases, is set forth in detail in forth in the *Declaration of Gary Richards in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 13].

10. On March 6, 2024, the Court confirmed the Plan and the Order confirming the Plan [Docket No. 589], the "Confirmation Order"). The Plan went Effective on June 9, 2026.[5]

BASIS FOR RELIEF REQUESTED

11. Section 1452 of title 28 of the United States Code and Bankruptcy Rule 9027 govern the removal of pending civil actions. Specifically, 28 U.S.C. § 1452(a) provides:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

12. Bankruptcy Rule 9027(a)(2) further provides, in pertinent part:

> If the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced, a notice of removal may be filed only within the longest of (A) 90 days after the order for relief in the case under the [Bankruptcy] Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the [Bankruptcy] Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2).

[5] See Notice of Effective Date [Docket No. 722].

13. With respect to post-petition actions, Bankruptcy Rule 9027(a)(3) provides that a notice of removal may be filed:

> only within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.

Fed. R. Bankr. P. 9027(a)(3).

14. Bankruptcy Rule 9006(b) provides that the Court may extend unexpired time periods, such as the Removal Deadline, without notice:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order …

Fed. R. Bankr. P. 9006(b)(1).

15. It is well settled that this Court is authorized to extend, for cause, the removal period provided under 28 U.S.C. § 1452 and Bankruptcy Rule 9027. *See Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984), *overruled on other grounds by, Things Remembered, Inc. v. Petrarca*, 516 U.S. 124, 134-35 (1995) (holding that the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"); *see also In re TK Holdings Inc.*, 2018 WL 1306271, at *46 (Bankr. D. Del. Mar. 18, 2010) (extending the time provided by Bankruptcy Rule 9027 to remove a civil action under 28 U.S.C. § 1452); *In re The Hertz Corp. et al.*, Case No. 20-11218 (MFW) (Bankr. D. Del. Aug. 10, 2020) (extending the removal period by 120 days without prejudice to right of debtors to seek further extensions); *In re PWM Property Management LLC, et al.*, Case No. 21-11445 (MFW) (Bankr. D. Del. Feb. 3, 2022) (same); *In re*

Virgin Orbit Holdings, Inc. et al., Case No. 23-10405 (KBO) (Bankr. D. Del. July 18, 2023) (same).

16. The Liquidating Trustee submits that ample cause exists to extend the Removal Deadline. While the Liquidating Trustee does not currently believe there are any Actions that need to be removed, the Liquidating Trustee and his professionals have not yet had the opportunity to properly consider, or make decisions concerning, all Actions currently pending. Therefore, the Liquidating Trustee believes that it is prudent to seek an extension of the Removal Deadline to preserve the rights of the Post-Effective Date Debtors and their estates to potentially remove any Actions, if necessary.

17. Given the Liquidating Trustee's focus to date, Liquidating Trustee has not had sufficient time to evaluate any pending Actions and possible removal pursuant to Bankruptcy Rule 9027(a). Accordingly, the Liquidating Trustee believes the current Removal Deadline of August 3, 2026 would not provide sufficient time for the Liquidating Trustee to determine conclusively which Actions, if any, they should seek to remove. The extension sought will afford the Liquidating Trustee an opportunity to make more fully-informed decisions concerning the existence of any Actions and their removal, and will ensure that the Post-Effective Date Debtors and their estates do not forfeit the valuable rights afforded to them under 28 U.S.C. § 1452. Absent the requested extension, the Liquidating Trustee will not be able to complete this review adequately, and the result could, among other things, unnecessarily hinder the Liquidating Trustee's ability to recover assets for the benefit of Post-Effective Date Debtors and their estates. Furthermore, the Liquidating Trustee submits that granting the extension requested herein will not prejudice the rights of any adversary in an existing Action because such parties are prevented from prosecuting Actions absent relief from the automatic stay. In addition, nothing herein will

prejudice any party to an existing Action that the Liquidating Trustee may ultimately attempt to remove from seeking the remand of such action under 28 U.S.C.§ 1452(b) at the appropriate time.

18. For the reasons set forth above, the Liquidating Trustee submits that extending the current Removal Deadline through and including February 1, 2027 is necessary, prudent, and in the best interests of the Post-Effective Date Debtors, their estates, and creditors.

NOTICE

19. Notice of this Motion has been provided to the following parties, or, in lieu thereof, their counsel: (a) the U.S. Trustee; (b) counsel to the Debtors; (c) counsel to the Plan Administrator; (d) the parties to the Actions and their counsel, if known; and (e) any party that has requested a renewed notice pursuant to Bankruptcy Rule 2002. The Liquidating Trustee submits that, in view of the facts and circumstances, such notice is sufficient, and no other or further notice need be provided.

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WHEREFORE, for the reasons set forth herein, the Liquidating Trustee respectfully requests that the Court grant the relief requested in this Motion and such other and further relief as is just and proper.

Dated: July 27, 2026

MORRIS JAMES LLP

/s/ Eric J. Monzo

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Counsel to Joshua Nahas as Liquidating Trustee of the Liquidating Trust

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AGDP HOLDING INC., *et al.,*[1]	Case No. 25-11446 (MFW)
Debtors.	(Jointly Administered)
	Re: Docket No. ___

ORDER EXTENDING THE DEADLINE TO FILE NOTICES TO REMOVE ACTIONS

Upon the motion (the "Motion")[2] of the Liquidating Trustee for the entry of an order (this "Order"), pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rules 9006(b) and 9027, and Local Rule 9006-2, extending the period within which the Liquidating Trustee may remove actions pursuant to 28 U.S.C. § 1452 through and including February 1, 2027; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012 (Sleet, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Bankruptcy Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the relief requested in the Motion (the "Hearing"); and upon consideration of the record of all of the proceedings had

[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] Capitalized terms used, but not otherwise defined herein, shall have the meanings ascribed to such terms in the Motion.

before the Court; and the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Removal Deadline is extended through and including February 1, 2027 pursuant to Bankruptcy Rule 9006.

3. The Liquidating Trustee is authorized to take all reasonable actions necessary or appropriate to effectuate the relief granted in this Order.

4. This Order shall be without prejudice to (i) any position the Liquidating Trustee may take regarding whether section 362 of the Bankruptcy Code applies to stay any litigation pending against the Post-Effective Date Debtors, or (ii) the Liquidating Trustee's right to seek a further extension of the Removal Deadline.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AGDP HOLDING INC., *et al.,*[1]	Case No. 25-11446 (MFW)
Debtors.	(Jointly Administered)
	Obj. Deadline: August 10, 2026 at 4:00 p.m. (ET) **Hearing Date: September 3, 2026 at 11:30 a.m. (ET)**

NOTICE OF THE LIQUIDATING TRUSTEE'S FOURTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE TO FILE NOTICES TO REMOVE ACTIONS

PLEASE TAKE NOTICE that on July 27, 2026, Joshua Nahas as liquidating trustee ("Liquidating Trustee") of the Liquidating Trust in the above-captioned proceeding filed the *Liquidating Trustee's Fourth Motion for Entry of an Order Extending the Deadline to File Notices to Remove Actions* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court as to be received on or before **August 10, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").** At the same time, you must also serve a copy of the response upon the Liquidating Trustee's undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be held on **September 3, 2026 at 11:30 a.m. (ET)** before the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801

IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

[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: July 27, 2026

MORRIS JAMES LLP

/s/ Eric J. Monzo

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