Docket #0775 Date Filed: 08/18/2026

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. 760

CERTIFICATE OF NO OBJECTION REGARDING THE LIQUIDATING TRUSTEE'S FOURTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE TO FILE NOTICES TO REMOVE ACTIONS

The undersigned counsel hereby certifies as follows:

On July 27, 2026, 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"), filed *The Liquidating Trustee's Fourth Motion for Entry of an Order Extending the Deadline to File Notices to Remove Actions* [Docket No. 760] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

The deadline to object to the Motion was August 14, 2026, at 4:00 p.m. (ET).

The undersigned further certifies that after reviewing the Court's docket in this case, no formal answer, objection, or other responsive pleading to the Motion appears thereon. The Liquidating Trustee respectfully requests that the Court enter the proposed order granting the Motion, a copy of which is attached hereto and to the Motion as **Exhibit A**.

[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: August 18, 2026

MORRIS JAMES LLP

/s/ Jason S. Levin
Eric J. Monzo (DE Bar No. 5214)
Jason S. Levin (DE Bar No. 6434)
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
jlevin@morrisjames.com

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. 760

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

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[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.