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)
	Hearing Date: October 1, 2026, at 10:30 a.m. (ET) **Obj. Deadline: September 11, 2026, at 4:00 p.m. (ET)**

PLAN ADMINISTRATOR'S FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS (NON-SUBSTANTIVE; AMENDED AND SUPERSEDED)

The above captioned debtors and debtors in possession (each a "Debtor" and collectively, the "Debtors"), through Hooman Yazhari, solely in his capacity as plan administrator (the "Plan Administrator") under the *Second Amended Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors* [D.I. 583] (the "Plan") respectfully represent as follows in support of this objection (this "Objection"):[2]

RELIEF REQUESTED

1. By this Objection, the Plan Administrator seeks entry of an order (the "Proposed Order"), substantially in the form attached hereto as **Exhibit B**, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3007 and 9014, and Bankruptcy Local Rule 3007-1, disallowing and expunging the claims listed on **Exhibit 1** to the Proposed Order (the "Amended Claims"), as the Amended Claims have been amended and superseded by later-filed claims. In

[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 them in the Plan.

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support of this Objection, the Plan Administrator submits the *Declaration of Ryan Williams in Support of the Plan Administrator's First Omnibus Objection to Certain Claims (Non-Substantive; Amended and Superseded)* (the "Williams Declaration"), attached hereto as **Exhibit A.**

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter 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 February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). The Debtors confirm their consent, pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion, to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory and legal bases for the relief requested herein are sections 105(a), 363, and 502 of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), Rules 3007, and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 3007-1.

GENERAL BACKGROUND

5. On August 4, 2025 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code thereby commencing these chapter 11 cases. On August 18, 2025, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed the Committee [D.I. 73].

6. On February 12, 2026, the Court entered an order confirming the Plan (the "Confirmation Order") [D.I. 589]. On June 9, 2026 (the "Effective Date"), the Plan became effective [D.I. 722], and the Plan Administrator was appointed in accordance with the terms of the Plan. As set forth in Section IV.H.4 of the Plan, the Plan Administrator is responsible for reconciling, liquidating, and paying Allowed Administrative Claims, Priority Tax Claims, Secured Claims, and Other Priority Claims.[3]

BAR DATE, SCHEDULES, AND SOFAS

7. On April 5, 2024, the Court entered an order [D.I. 35] appointing Kurtzman Carson Consultants, LLC dba Verita Global ("Verita") as claims and noticing agent in the chapter 11 cases. Among other things, Verita is authorized to (a) receive, maintain, and record and otherwise administer the proofs of claim filed in these chapter 11 cases, and (b) maintain official claims registers for the Debtors.

8. On September 2, 2025, the Court entered the *Order (I) Establishing Bar Dates for Filing Proofs of Prepetition Claims, Including Section 503(B)(9) Claims; (II) Approving the Form and Manner of Notice Thereof; and (III) Granting Related Relief* [D.I. 131] (the "Bar Date Order"), which established October 31, 2025 (the "Bar Date") as the last date for all creditors, other than governmental units, holding a claim against one or more of the Debtors to file and serve a written proof of claim for payment of any such claim. Notice of the Bar Date was provided by mail and by publication in accordance with the procedures outlined in the Bar Date Order.

9. Pursuant to the Plan and Confirmation Order, the bar date for creditors to file Administrative Claims (the "Administrative Claims Bar Date") was established as July 9, 2026.

[3] Section IV.I of the Plan provides that the Liquidating Trustee (as defined in the Plan) is responsible for all other claims reconciliation.

Notice of the Administrative Claims Bar Date was provided by mail pursuant to the procedures outlined in the Plan and Confirmation Order.

10. On September 30, 2025, each Debtor filed its respective schedules of assets and liabilities (the "Schedules") and statements of financial affairs (the "SOFAs") [D.I. 240-9].

CLAIMS RESOLUTION PROCESS

11. To date, approximately 350 proofs of claim have been asserted in the Debtors' chapter 11 cases. Both prior to and after the Effective Date, the Debtors and the Plan Administrator (as applicable), and their professionals have reviewed and reconciled the filed proofs of claim with the Debtors' books and records to determine the validity of the asserted claims. This reconciliation process includes identifying particular categories of claims that may be targeted for modification, disallowance, or expungement. To avoid possible improper recovery by claimants, the Plan Administrator is filing this Objection to the Amended Claims.

OBJECTION TO AMENDED CLAIMS

12. Each of the Amended Claims listed on **Exhibit 1** to the Proposed Order under the column titled "*Amended Claim to be Disallowed*" has been amended and superseded by a subsequently-filed proof of claim as listed under the column titled "*Remaining Claim Number*" (collectively, the "Surviving Claims") on **Exhibit 1** to the Proposed Order. Therefore, the Amended Claims no longer represent valid claims against the applicable Debtor's estate. The Plan Administrator believes that it was the claimants' intention to withdraw the Amended Claim against the applicable Debtor and that the Amended Claims were only inadvertently left on the claims register.

13. Accordingly, the Plan Administrator objects to the Amended Claims, and requests entry of the Proposed Order disallowing and expunging each of the Amended Claims, as indicated on **Exhibit 1** thereto.

BASIS FOR RELIEF REQUESTED

14. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d. Cir. 1992); *Matter of Int'l Match Corp.*, 69 F.2d 73, 76 (2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *In re Allegheny Int'l, Inc.*, 954 F.2d at 173. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim's *prima facie* validity. *Id*.

15. The Bar Date Order provides that each proof of claim must include supporting documentation, or if voluminous, a summary or explanation as to why documentation is not available. Absent such documentation, a proof of claim lacks *prima facie* validity. *Ashford v. Consolidated Pioneer Mortg. (In re Consolidated Pioneer Mortg.)*, 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995), *aff'd*, 91 F.3d 151 (9th Cir. 1996); *In re Taylor*, 363 B.R. 303, 308 (Bankr. M.D. Fla. 2007) ("Attaching supporting documentation is a mandatory prerequisite to establishing a claim's *prima facie* validity"). For a proof of claim to be legally sufficient, it must (a) "be in writing;" (b) "make a demand upon the debtor's estate;" (c) "express the intent to hold the debtor liable for the debt;" (d) "be properly filed;" and (e) "be based upon facts [that] would allow, as a matter of equity, . . . the document [to be] accepted as a proof of claim." *First Nat'l Bank of Fayetteville, Ark. v. Circle J. Diary, Inc. (In re Circle J. Diary, Inc.)*, 112 B.R. 297, 299-300 (Bankr. W.D. Ark.

1990). In practice, the objecting party must produce evidence that "would refute at least one of the allegations that is essential to the claim's legal sufficiency." *In re Allegheny Int'l, Inc.*, 954 F.2d at 173. Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id*. "The burden of persuasion is always on the claimant." *Id*.

16. For the reasons set forth herein, the Amended Claims addressed in this Objection should be disallowed and expunged as set forth in **Exhibit 1** to the Proposed Order.

SEPARATE CONTESTED MATTERS

17. To the extent that a response is filed regarding any Amended Claim listed in the Objection and the Plan Administrator is unable to resolve the response, each such claim, and the objection as it pertains to such claim, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding this Objection shall be deemed a separate order with respect to each claim.

18. The Plan Administrator hereby reserves the right to object in the future to any of the proofs of claim listed in this Objection or on the exhibit attached hereto on any ground, and to amend, modify, and/or supplement this Objection, including to object to amended or newly filed claims. Separate notice and hearing will be scheduled for any such objection.

NOTICE

19. Notice of the filing of this Objection has been provided to: (a) the Office of the United States Trustee for the District of Delaware; (b) each holder of an Amended Claim that is the subject of this Objection; and (c) all parties that have filed a notice of appearance and request for service of papers in these chapter 11 cases pursuant to Bankruptcy Rule 2002. In light of the

nature of the relief requested herein, the Plan Administrator submits that no other or further notice is necessary.

[*Remainder of page intentionally left blank.*]

WHEREFORE, the Plan Administrator respectfully requests entry of the Proposed Order, substantially in the form attached hereto, granting the relief requested herein and granting such other relief as is just and proper.

Dated: August 21, 2026
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ S. Alexander Faris

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Counsel to the Plan Administrator

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)
	Hearing Date: October 1, 2026, at 10:30 a.m. (ET) **Obj. Deadline: September 11, 2026, at 4:00 p.m. (ET)**

NOTICE OF FIRST OMNIBUS OBJECTION

PLEASE TAKE NOTICE that the above captioned debtors and debtors in possession (each a "Debtor" and collectively, the "Debtors"), through Hooman Yazhari, solely in his capacity as plan administrator (the "Plan Administrator") under the *Second Amended Joint Chapter 11 Plan of Liquidation for AGDP Holding Inc. and Its Affiliated Debtors* [D.I. 583] has filed the *Plan Administrator's First Omnibus Objection to Certain Claims (Non-Substantive; Amended and Superseded)* (the "Objection")[2] with the United States Bankruptcy Court for the District of Delaware (the "Court").

PARTIES RECEIVING THE OBJECTION SHOULD REVIEW EXHIBIT 1, ATTACHED TO THE PROPOSED ORDER, TO DETERMINE IF THEIR CLAIM IS SUBJECT TO THE OBJECTION.

PLEASE TAKE FURTHER NOTICE that that any responses (each, a "Response") to the Objection must be filed on or before **September 11, 2026 at 4:00 p.m. (ET)** (the "Response Deadline") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of the Response upon the undersigned counsel to the Plan Administrator so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

a. a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;

[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 not otherwise defined herein shall have the meanings ascribed to them in the Objection.

b. the name of the claimant and description of the basis for the amount of the disputed claim;

c. a concise statement setting forth the reasons why a particular disputed claim should not be disallowed for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the hearing;

d. all documentation or other evidence of the disputed claim in question, to the extent not already included with the claimant's proof of claim, upon which the claimant will rely in opposing the Objection at the hearing;

e. the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) possessing ultimate authority to reconcile, settle, or otherwise resolve the disputed claim on behalf of the claimant; and

f. the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) to whom the Plan Administrator should serve any reply to the Response.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE OBJECTION WILL BE HELD ON **OCTOBER 1, 2026 AT 10:30 A.M. (ET)** BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY COURT JUDGE FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS, YOU WILL BE DEEMED TO HAVE CONCURRED WITH AND CONSENTED TO THE OBJECTION AND THE RELIEF REQUESTED THEREIN, AND THE PLAN ADMINISTRATOR WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, THE PROPOSED ORDER SUSTAINING THE OBJECTION.

PLEASE TAKE FURTHER NOTICE THAT QUESTIONS CONCERNING THE OBJECTION SHOULD BE DIRECTED TO THE UNDERSIGNED COUNSEL FOR THE PLAN ADMINISTRATOR, TO THE ATTENTION OF S. ALEXANDER FARIS. CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE COURT TO DISCUSS THE MERITS OF THEIR DISPUTED CLAIMS OR THE OBJECTION.

Dated: August 21, 2026
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ S. Alexander Faris

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Counsel to the Plan Administrator

Exhibit A

Williams Declaration

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)

DECLARATION OF RYAN WILLIAMS
IN SUPPORT OF THE PLAN ADMINISTRATOR'S
FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS
(NON-SUBSTANTIVE, AMENDED AND SUPERSEDED)

I, Ryan Williams, pursuant to 28 U.S.C. § 1746, declare:

1. I am a Director of Triple P TRS, LLC ("Portage Point"), a restructuring advisory firm that served as restructuring advisor to the Debtors during the Debtors' chapter 11 cases, which role continued after the Effective Date of the Debtors' chapter 11 plan. As a result of my position, I am familiar with the Debtors' day-to-day business operations and affairs, books and records, and the Debtors' chapter 11 efforts.

2. I submit this declaration (this "Declaration") in support of the *Plan Administrator's First Omnibus Objection to Certain Claims (Non-Substantive; Amended and Superseded)* (the "Objection"). [2]

3. I have read the Objection and am directly, or by and through other personnel or representatives of the Debtors, reasonably familiar with the information contained therein, the

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

Proposed Order, and the exhibits attached to the Proposed Order. I am authorized to execute this Declaration on behalf of the Debtors.

4. Considerable resources and time have been expended in reviewing and reconciling the proofs of claim filed or pending against the Debtors and their estates in these chapter 11 cases.

5. I, along with my colleagues, the Debtors' other professional advisors, and the Debtors' former employees, was involved in the process of reviewing and reconciling the proofs of claim, as well as in the preparation of the Objection. In this regard, I, along with my colleagues and the Debtors' other professional advisors (a) reviewed (i) the claims register, by which we identified claims that should be disallowed, and (ii) the Debtors' books and records with respect to the claims described in the Objection, (b) conferred with the Debtors' former employees and outside counsel having knowledge relevant to understanding the validity of the claims, (c) approved the inclusion of the claims in the Objection, and (d) reviewed the Objection and the Proposed Order. Accordingly, I am familiar with the information contained therein and in **Exhibit 1** to the Proposed Order.

6. The information contained in **Exhibit 1** to the Proposed Order is true and correct to the best of my knowledge, information, and belief.

7. I have determined that each of the Amended Claims listed on **Exhibit 1** to the Proposed Order has been amended and superseded by a subsequently filed proof of claim. Therefore, the Amended Claims no longer represent valid claims against the Debtors' estates and should be disallowed and expunged as set forth on **Exhibit 1** to the Proposed Order. Any failure to disallow the Amended Claims will result in the applicable claimants potentially receiving an unwarranted double recovery against the Debtors' estates, to the detriment of other creditors in these Chapter 11 Cases.

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

Dated: August 21, 2026

/s/ Ryan Williams

Ryan Williams
Director
Triple P TRS, LLC

Exhibit B

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)
	Ref. Docket No. ____

ORDER DISALLOWING CLAIMS AS SET FORTH IN THE PLAN ADMINISTRATOR'S FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS (NON-SUBSTANTIVE; AMENDED AND SUPERSEDED)

Upon consideration of the objection (the "Objection")[2] of the Plan Administrator pursuant to section 502(b) of the Bankruptcy Code and Rule 3007 of the Bankruptcy Rules, seeking entry of an order (this "Order") disallowing and expunging certain Amended Claims; and this Court having jurisdiction over this matter 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; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Objection having been given under the particular circumstances; and it

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

appearing that no other or further notice is necessary; and this Court having reviewed the Objection, the Williams Declaration, the Amended Claims listed on **Exhibit 1** attached hereto, and any responses thereto; and upon the record of these chapter 11 cases; and this Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.

2. The Amended Claims listed on **Exhibit 1** are hereby disallowed and expunged in their entirety.

3. Verita, the Debtors' claims and noticing agent, shall update the claims register to reflect the relief granted in this Order.

4. The Plan Administrator's rights to file additional objections to the Amended Claims or any other proofs of claim that have been or may be filed against the Debtors are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Plan Administrator's rights to object on other stated grounds or on any other grounds that the Plan Administrator discovers during the pendency of these chapter 11 cases are further preserved.

5. Each Amended Claim and the objection by the Plan Administrator to such Amended Claims, as addressed in the Objection and as set forth in **Exhibit 1** attached hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Amended Claim. Any stay of this Order pending appeal by any claimant whose Amended Claim is subject to this Order

shall only apply to the contested matter that involves such claimant and Amended Claim and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters or Amended Claims listed in the Objection or this Order.

6. The terms and conditions of this Order shall be immediately effective and enforceable, and the time to appeal this Order shall commence upon its entry. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

7. This Court shall retain jurisdiction with respect to all matters related to or arising from the Objection or the implementation of this Order.

Exhibit 1

Amended Claims

Exhibit 1

Amended Claim Exhibit

#	Name of Claimant and Address	Amended Claim to be Disallowed	Remaining Claim Number	Debtor	Claim Date	Claim Amount to Disallowed (Proof of Claim as Filed)	Reason for Disallowance
1	American Society of Composers, Authors and Publishers 250 West 57th St New York, NY 10107	308	310	AGDP Holding Inc.	12/16/2025	Secured $0.00 Admin Priority $17,458.10 Priority $0.00 General Unsecured $0.00 Total Claim $17,458.10	The claim in the "Remaining Claim No." column amends and supercedes the claim in the "Amended Claim to be Disallowed" column. The Amended Claim should be disallowed and expunged in its entirety.
2	Loupe Digital Inc 117 East 24th Street, 5th Floor New York, NY 10010	11	298	Avant Gardner, LLC	8/12/2025	Secured $0.00 Admin Priority $0.00 Priority $17,200.00 General Unsecured $53,182.24 Total Claim $70,382.24	The claim in the "Remaining Claim No." column amends and supercedes the claim in the "Amended Claim to be Disallowed" column. The Amended Claim should be disallowed and expunged in its entirety.
3	New York State Department of Taxation and Finance PO Box 5300 Albany, NY 12205-0300	9	51	Avant Gardner, LLC	8/12/2025	Secured $2,234,093.28 Admin Priority $0.00 Priority $0.00 General Unsecured $0.00 Total Claim $2,234,093.28	The claim in the "Remaining Claim No." column amends and supercedes the claim in the "Amended Claim to be Disallowed" column. The Amended Claim should be disallowed and expunged in its entirety.