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: November 19, 2026 at 4:00 p.m. (ET) **Hearing Date: December 3, 2026 at 11:30 a.m. (ET)**

THE LIQUIDATING TRUSTEE'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE CLAIM OBJECTION DEADLINE

Joshua Nahas, in his capacity as liquidating trustee ("Liquidating Trustee") of the Liquidating Trust ("Liquidating Trust") of AGDP Holding Inc. and its affiliated debtors ("Debtors" and after the Effective Date (defined below), 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* ("Plan") [Docket No. 583],[2] by and through his undersigned counsel, hereby files this motion ("Motion") for the entry of an order, substantially in the form attached hereto as **Exhibit A** ("Proposed Order"), (a) extending the deadline to object to claims by approximately 180 days, from December 7, 2026 ("Claim Objection Deadline")[3] through and including June 7, 2027, without prejudice to the right of the Liquidating Trustee to seek further extensions; and (b) granting related relief.[4] In support of the Motion, the Liquidating

[1] The Debtors in these chapter 11 cases, together with the last four digits of the Debtors' federal tax identification numbers, 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 their respective meanings ascribed to them in the Plan.

[3] Pursuant to Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware ("Local Rules"), because this Motion was filed prior to the Claim Objection Deadline, the time is automatically extended until the Court acts on the Motion, without the necessity for the entry of a bridge order.

[4] The requested extension of 180 days falls on Saturday, June 5, 2027. Accordingly, pursuant to Rule 9006(a)(1)(C) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), the extended deadline shall continue to run until the end of the next day that is not a Saturday, Sunday, or legal holiday.

2511446261105000000000004

Trustee respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware ("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 is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The Liquidating Trustee confirms its consent, pursuant to Local Rule 9013-1(f), 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.

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

3. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 ("Bankruptcy Code"), Bankruptcy Rule 9006, and Local Rules 9006-1 and 9006-2.

BACKGROUND

4. On August 4, 2025 (the "Petition Date"), the Debtors each commenced 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.

5. 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 the *Declaration of Gary Richards in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 13].

6. On August 5, 2025, the Court entered an order authorizing the Debtors to appoint Kurtzman Carson Consultants, LLC dba Verita Global ("Verita") as claims and noticing agent in the Chapter 11 Cases [Docket No. 35] to, among other things, serve as the authorized repository for all proofs of claim filed in the cases and maintain the official claims register for the Debtors (the "Claims Register").

7. 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* [Docket No. 131] (the "Bar Date Order"), establishing, among other things, October 21, 2025, at 5:00 p.m. (prevailing Eastern Time) as the deadline for non-governmental entities to file prepetition claims against the Debtors and their estates (the "General Bar Date") and February 2, 2026, at 5:00 p.m. (prevailing Eastern Time) as the deadline for governmental entities to file prepetition claims against the Debtors and their estates (together with the General Bar Date, the "Bar Dates"). Verita subsequently mailed the Bar Date Order, a notice of the Bar Dates, and proof of claim forms to all the Debtors' creditors and other known parties in interest as of the Petition Date, as set forth on the affidavits of service thereof [Docket Nos. 164, 298, 300 and 556] (collectively, the "Affidavits of Service").

8. On September 30, 2025, each Debtor filed its Schedules of Assets and Liabilities (collectively, the "Schedules") and Statement of Financial Affairs, each as may have been amended from time to time.

9. On February 12, 2026, the Court entered the *Findings of Fact, Conclusions of Law and Order Approving the Disclosure Statement on a Final Basis and Confirming the Joint Chapter*

11 Plan of Liquidation for AGDP Holding Inc. and its Affiliated Debtors ("Confirmation Order") [Docket No. 589], confirming the Plan. The Plan became effective in accordance with its terms on June 9, 2026 (the "Effective Date") [Docket No. 722]. Pursuant to the Plan and Confirmation Order, the initial deadline to object to claims in these Chapter 11 Cases is 180 days after the Effective Date, or December 7, 2026, after application of Bankruptcy Rule 9006(a)(1)(C), subject to extension by the Court.

10. The Plan provides for the creation of the Liquidating Trust to succeed to the rights and obligations of the Debtors as set forth in, and to facilitate the administration of, the Plan. Pursuant to the Plan and the Liquidating Trust Agreement annexed to the Plan, the Liquidating Trust was created, and Joshua Nahas was appointed as trustee of the Liquidating Trust as of the Effective Date.

11. The Liquidating Trustee and his advisors are continuing to conduct a diligent review of the Claims Register, including any documents attached to or otherwise supporting the claims and the Debtors' books and records. While the Liquidating Trustee has made progress working through the Claims Register, this process is ongoing and additional time is needed to determine which claims may be objectionable.

12. Following the Effective Date, the Liquidating Trustee has been actively engaged in fulfilling his post-confirmation obligations. His efforts have included, among other things, administrative coordination, securing access to various records, investigating potential causes of action, and evaluating and resolving certain claims.

BASIS FOR RELIEF

13. Section 105 of the Bankruptcy Code provides that the "court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

14. Bankruptcy Rule 9006(b) permits the Court, in its discretion, to enlarge the Claim Objection Deadline for cause. Bankruptcy Rule 9006(b) provides:

> [W]hen these rules, a notice given under these rules, or a court order requires or allows an act to be performed at or within a specified period . . . the court may—at any time and for cause—extend the time to act if . . . a request to extend is made before the period (or a previously extended period) expires . . . .

Fed. R. Bankr. P. 9006(b)(1). As the Claim Objection Deadline is currently December 7, 2026, this request to further extend the Claim Objection Deadline complies with Bankruptcy Rule 9006(b)(1).

15. Although Bankruptcy Rule 9006 does not define "cause," it has been noted that "courts should be liberal in granting extensions of time sought before the period to act has elapsed, as long as the moving party has not been guilty of negligence or bad faith and the privilege of extensions has not been abused . . . ." 10 COLLIER ON BANKRUPTCY (15th ed. rev. 2008 at 9006-14).

16. Since the Effective Date, to diligently and efficiently administer and wind-down the Debtors' estates, the Liquidating Trustee and his advisors have continued to narrow the universe of claims subject to objection and identify claims appropriate for omnibus or individual objections, review supporting documentation, and obtain a clearer view of the overall claims against the Debtors. The Liquidating Trustee, however, needs additional time to complete his review of the Claims Register in these Chapter 11 Cases – a task that has been complicated by the state of and access to the Debtors' books and records and the complex issues implicated by such

claims. Additional time to review and effectively evaluate claims, prepare and prosecute objections to claims and, where possible, consensually resolve such claims, is in the best interests of the Liquidating Trust, its beneficiaries, and the Debtors' estates.

17. In addition to the general unsecured claims reconciliation process, since the Effective Date, the Liquidating Trustee has devoted time to (i) addressing other administrative matters and (ii) gaining access to information necessary to prepare tax returns, wind down the Debtors' estates, and determine the full range of Liquidating Trust Assets, including investigating certain claims and potential causes of action.

18. Given the substantial work being performed and the remaining work to be performed, as set forth above, the Liquidating Trustee seeks additional time to continue the claims reconciliation process. The Liquidating Trustee submits that extending the Claim Objection Deadline is in the best interests of all stakeholders. The extension will afford the Liquidating Trustee and his advisors an opportunity to make more fully informed decisions concerning pending claims, in the interest of ensuring appropriate distributions to, and maximizing value for, holders of allowed claims in accordance with the Plan.

19. Furthermore, the requested extension of the Claim Objection Deadline is sought in good faith and not for purposes of delay, nor will it affect or prejudice any claimant's substantive rights or defenses to an objection. Rather, the extension is intended to promote the efficient administration of these Chapter 11 Cases and the claims allowance process. Absent the requested extension of the Claim Objection Deadline, the Liquidating Trustee may be foreclosed from objecting to or challenging invalid, satisfied, misclassified, or overstated general unsecured claims before completing the claims reconciliation process, to the detriment of holders of allowed claims.

20. Moreover, such relief is routinely granted in this District. *See, e.g., In re Mosaic Companies, LLC*, Case No. 25-11296 (CTG) (Bankr. D. Del. July 17, 2026) [D.I. 645] (extending claim objection deadline by 180 days); *In re Mallinckrodt plc, et al.*, Case No. 20-12522 (JTD) (Bankr. D. Del. Aug. 16, 2023) [D.I. 8926] (same); *In re Exide Holdings, Inc.*, Case No. 20-11157 (LSS) (Bankr. D. Del. Jan. 9, 2023) [D.I. 1935] (extending the deadline to object to claims by 120 days); *In re BBGI US, Inc.*, et al., Case No. 20-11786 (CSS) (Bankr. D. Del. Nov. 18, 2021) [D.I. 1380] (extending the deadline to object to claims by 180 days); *In re Vitamin OldCo Holdings, Inc. (f/k/a/ GNC Holdings Inc.), et al.*, Case No. 20-11662 (KBO) (Bankr. D. Del. Apr. 13, 2021) [D.I. 1855] (same).

21. For the reasons set forth above, the Liquidating Trustee submits that an extension of the Claim Objection Deadline requested herein is (i) reasonable and necessary under the circumstances, (ii) well within the range of extensions granted in comparable chapter 11 cases, and (iii) inures to the benefit of creditors and parties in interest. As such, the Liquidating Trustee respectfully requests that the Court grant the proposed extension of the Claim Objection Deadline.

RESERVATION OF RIGHTS

22. The Liquidating Trustee reserves the right to seek further extensions of the Claim Objection Deadline.

NOTICE

23. Notice of this Motion will be provided to (i) the Office of the United States Trustee for the District of Delaware, and (ii) all parties who, as of the filing of the Motion, have filed a renewed notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. The Liquidating Trustee submits that, in light of the nature of the relief requested herein, no other or further notice is required.

WHEREFORE, the Liquidating Trustee respectfully requests that this Court enter the Proposed Order: (i) extending the Claim Objection Deadline through and including June 7, 2027, without prejudice to the right of the Liquidating Trustee to seek further extensions; and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: November 5, 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

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: November 19, 2026 at 4:00 p.m. (ET) **Hearing Date: December 3, 2026 at 11:30 a.m. (ET)**

NOTICE OF THE LIQUIDATING TRUSTEE'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE CLAIM OBJECTION DEADLINE

PLEASE TAKE NOTICE that on November 5, 2026, Joshua Nahas, in his capacity as liquidating trustee ("Liquidating Trustee") of the Liquidating Trust ("Liquidating Trust") of AGDP Holding Inc. and its affiliated debtors (the "Debtors" and after the Effective Date, the "Post-Effective Date Debtors"), by and through his undersigned counsel, filed *The Liquidating Trustee's Motion for Entry of an Order Extending the Claim Objection Deadline* ("Motion") with the United States Bankruptcy Court for the District of Delaware ("Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the Motion must be filed and received before **November 19, 2026, at 4:00 p.m. (ET) ("Objection Deadline")** with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection or response on the undersigned counsel so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on **December 3, 2026, at 11:30 a.m. (ET)** before the Honorable Mary F. Walrath, United States Bankruptcy Judge 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 IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

[*Signature Page to Follow*]

[1] The Debtors in these chapter 11 cases, together with the last four digits of the Debtors' federal tax identification numbers, 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: November 5, 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. ___

ORDER EXTENDING THE CLAIM OBJECTION DEADLINE

Upon the motion (the "Motion")[2] of Joshua Nahas, in his capacity 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 sections 105(a) and 502(b) of the Bankruptcy Code, Bankruptcy Rule 9006, and the authority granted to the Liquidating Trustee pursuant to the Plan and Confirmation Order, for an order extending the Claim Objection Deadline through and including June 7, 2027; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Liquidating Trust, its beneficiaries, the Debtors' estates, and all parties in interest, and that the legal and factual bases

[1] The Debtors in these chapter 11 cases, together with the last four digits of the Debtors' federal tax identification numbers, 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 meaning ascribed to them in the Motion or, if not defined in the Motion, such meanings in the Plan (as defined in the Motion).

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 Claim Objection Deadline is hereby extended through and including June 7, 2027, without prejudice to the right of the Liquidating Trustee to seek further extensions of such deadline.

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

4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules are hereby satisfied by such notice.

5. Notwithstanding any Bankruptcy Rule or Local Rule that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately enforceable upon its entry.

6. The Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the interpretation, implementation, or 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)

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of November, 2026, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of *The Liquidating Trustee's Motion for Entry of an Order Extending the Claim Objection Deadline* upon the parties that are registered to receive notice via the Court's CM/ECF notification system and additional service was completed by electronic mail on the parties indicated on the attached service list.

/s/ Jason S. Levin
Jason S. Levin (DE Bar No.6434)

[1] The Debtors in these chapter 11 cases, together with the last four digits of the Debtors' federal tax identification numbers, 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.

Core/2002 Service List

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Email
Plan Administrator	Hooman Yazhari	c/o Young Conaway Stargatt & Taylor, LLP	Sean M. Beach, S. Alexander Faris, Edmon L. Morton	1000 North King Street	Rodney Square	Wilmington	DE	19801	hyazhari@gmail.com
Claims Agent	KCC dba Verita	Michael Paque	100 N. Pacific Coast Highway, Suite 100			El Segundo	CA	90245	AGDPinfo@VeritaGlobal.com
US Trustee for District of DE	Office of the United States Trustee Delaware	Jonathan Lipshie	844 King St Ste 2207	Lockbox 35		Wilmington	DE	19801	jon.lipshie@usdoj.gov
Counsel for the Debtors and Plan Administrator	Young Conaway Stargatt & Taylor, LLP	Sean M. Beach, S. Alexander Faris, Evan S. Saruk, Edmon L. Morton	1000 North King Street	Rodney Square		Wilmington	DE	19801	sbeach@ycst.com; afaris@ycst.com; esaruk@ycst.com; emorton@ycst.com