IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
VILLAGE ROADSHOW ENTERTAINMENT GROUP USA INC., et al., 1) Case No. 25-10475 (TMH)
Debtors.) (Jointly Administered)
Debiois.) Ref. Docket No. 5

CERTIFICATION OF COUNSEL

On March 17, 2025, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the Debtors' Motion for Entry Interim and Final Orders (I) Authorizing the Redaction of Certain Personally Identifiable Information of Individuals from the Consolidated List of Creditors and Certain Other Filings and (II) Granting Related Relief [D.I. 115] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court"). A proposed form of order approving the Motion on a final basis was attached to the Motion as Exhibit B (the "Proposed Final Order").

On March 18, 2025, the Court entered an order approving the Motion on an interim basis [D.I. 63] (the "Interim Order"). Pursuant to the Interim Order, any objections or responses to entry of the Proposed Final Order were to be filed and served by April 3, 2025, at 4:00 p.m. (ET), (as may have been extended by the Debtors for any party, the "Objection Deadline"). Prior to the Objection Deadline, the Debtors received informal comments from the official committee of

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unsecured creditors (the "<u>Committee</u>"). No other formal or informal responses or objections to the Proposed Order were received.

Following discussions with the Committee, the Debtors have agreed to a revised form of order (the "Revised Proposed Final Order"), a copy of which is attached hereto as **Exhibit A**, which resolves the Committee's comments. For the convenience of the Court and other interested parties, a blackline comparing the Revised Proposed Final Order against the Proposed Final Order is attached hereto as **Exhibit B**.

As no other objections or responses to the Motion have been received, it is hereby respectfully requested that the Revised Proposed Final Order be entered at the earliest convenience of the Court.

[Remainder of Page Intentionally Left Blank]

Dated: April 9, 2025 Wilmington, Delaware

/s/ Joseph M. Mulvihill

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Proposed Co-Counsel for the Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
VILLAGE ROADSHOW ENTERTAINMENT) Case No. 25-10475 (TMH)
GROUP USA INC., et al., ¹) (Jointly Administered)
Debtors.) Ref. Docket Nos. 5 & 62
)

FINAL ORDER (I) AUTHORIZING THE REDACTION OF CERTAIN PERSONALLY IDENTIFIABLE INFORMATION OF INDIVIDUALS FROM THE CONSOLIDATED LIST OF CREDITORS AND CERTAIN OTHER FILINGS AND (II) GRANTING RELATED RELIEF

Upon the motion (the "Motion")² of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of a final order (this "Final Order"): (a) authorizing the Debtors to redact certain personally identifiable information of individuals contained within the Debtors' consolidated list of creditors (the "Creditor Matrix") and any other filing within these chapter 11 cases that may similarly contain personally identifiable information of individuals; and (b) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; 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 February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court

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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at an interim hearing before this Court (the "Hearing"); and this Court having entered an interim order on the Motion [Docket No. 62] (the "Interim Order"); and this Court having found that the Debtors' notice of a final hearing on the Motion and opportunity for a final hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

- 1. The Motion is GRANTED on a final basis as set forth herein.
- 2. The Debtors are authorized, pursuant to section 107(c)(1) of the Bankruptcy Code, to redact on the Creditor Matrix, the Schedules and Statements, affidavits of service, and any other documents filed with the Court the home and email addresses of natural persons, including individual creditors and individual equity holders. The Debtors shall provide an unredacted version of the Creditor Matrix, the Schedules and Statements, and any other filings redacted pursuant to this Final Order to (a) the Court, (b) the U.S. Trustee, (c) counsel to the Official Committee of Unsecured Creditors (the "Committee") appointed in these chapter 11 cases, (d) the Claims and Noticing Agent, and (e) any party in interest upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to these chapter 11 cases; provided that any

receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request unless otherwise required to be disclosed by law or court order. The Debtors shall inform the U.S. Trustee and the Committee promptly after denying any request for an unredacted document pursuant to this Final Order.

- 3. Nothing herein precludes a party in interest's right to file a motion requesting that the Court unseal the information reducted by this Final Order.
- 4. The Debtors shall file a redacted version of the Creditor Matrix and the Schedules and Statements, and shall post the redacted versions of such documents on Verita's website at https://www.veritaglobal.net/vreg.
 - 5. The Debtors shall file an unredacted Creditor Matrix under seal with the Court.
- 6. Nothing in this Final Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any natural person whose personally identifiable information is sealed or redacted pursuant to this Final Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Final Order shall be confirmed in the corresponding certificate of service.
- 7. To the extent a party in interest files a document on the docket in these chapter 11 cases that is required to be served on creditors whose information is under seal pursuant to this Final Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of the Claims and Noticing agent, to effectuate the service on such party's behalf.
- 8. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Final Order are immediately effective and enforceable upon entry.

- 9. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Final Order in accordance with the Motion.
- 10. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Final Order.

EXHIBIT B

Blackline

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re:) Chapter 11
VILLAGE ROADSHOW ENTERTAINMENT GROUP USA INC., et al., 1) Case No. 25-10475 <u>(TMH)</u>
Debtors.) (Jointly Administered)
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IT IS HEREBY ORDERED THAT:

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chapter 11 cases, (d) the Claims and Noticing Agent, and (e) any party in interest upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to these chapter 11 cases; provided that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request unless otherwise required to be disclosed by law or court order. The Debtors shall inform the U.S. Trustee and the Committee promptly after denying any request for an unredacted document pursuant to this Final Order.

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