

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

VILLAGE ROADSHOW ENTERTAINMENT
GROUP USA INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-10475 (TMH)
)
) (Jointly Administered)
)
)

**NOTICE OF AMENDED² AGENDA FOR HEARING OF MATTERS
SCHEDULED FOR APRIL 11, 2025 AT 1:30 P.M. (ET)**

HEARING INSTRUCTIONS

**THE HEARING HAS BEEN ADJOURNED TO APRIL 16, 2025 AT 2:00 P.M. (ET),
AND WILL BE HELD IN COURTROOM 4.**

ADJOURNED MATTER

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [[D.I. 9](#), 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Declaration of George N. Koutsonicolis in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [[D.I. 10](#), 3/17/25]

¹ The last four digits of Village Roadshow Entertainment Group USA Inc.'s federal tax identification number are 0343. The mailing address for Village Roadshow Entertainment Group USA Inc. is 750 N. San Vicente Blvd., Suite 800 West, West Hollywood, CA 90069. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors and the last four digits of their federal tax identification is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/vreg>.

² **Amendments appear in bold.**



251047525040900000000014

- B. Interim Order (I) Authorizing the Debtors to Obtain Post-Petition Secured Financing, and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [[D.I. 69](#), 3/19/25]
- C. [SEALED] Declaration of Wayne M. Smith in Support of Warner Bros. Entertainment Inc.'s Objections to (X) the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief, and (Y) the Debtors' Motion for Entry of Orders (I)(A) Approving Bid Procedures for the Sale of the Debtors' Assets, (B) Authorizing the Debtors' Entry into the Stalking Horse APA and Approving Bid Protections Thereunder, (C) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (D) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, and (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[D.I. 147](#), 4/7/25]
- D. [REDACTED] Declaration of Wayne M. Smith in Support of Warner Bros. Entertainment Inc.'s Objections to (X) the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief, and (Y) the Debtors' Motion for Entry of Orders (I)(A) Approving Bid Procedures for the Sale of the Debtors' Assets, (B) Authorizing the Debtors' Entry into the Stalking Horse APA and Approving Bid Protections Thereunder, (C) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (D) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, and (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[D.I. 150](#), 4/7/25]
- E. Warner Bros. Entertainment Inc.'s Witness and Exhibit List for April 11, 2025 Hearing [[D.I. 152](#), 4/8/25]
- F. Debtors' Witness and Exhibit List [[D.I. 154](#), 4/8/25]
- G. The Official Committee of Unsecured Creditors' Witness and Exhibit List [[D.I. 155](#), 4/8/25]

Objections Filed:

A. Informal Responses

- i. Magnum
- ii. ABS Noteholders
- iii. Sony
- iv. Landlord
- v. U.S. Trustee
- vi. Official Committee of Unsecured Creditors

B. Omnibus Limited Objection and Reservation of Rights by the Directors Guild of America, Inc., Screen Actors Guild-American Federation of Television and Radio Artists, The Writers Guild of America, West, Inc., Their Respective Pension and Health Plans, and the Motion Picture Industry Pension and Health Plans to (I) Debtors' Motion for Entry of Orders (I) (A) Approving Bid Procedures for the Sale of the Debtors' Assets, (B) Authorizing the Debtors' Entry into the Stalking Horse APA and Approving Bid Protections Thereunder, (C) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (D) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, and (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[D.I. 126](#), 4/3/25]

C. [SEALED] Warner Bros. Entertainment Inc.'s Objection to the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final hearing, and (VI) Granting Related Relief [[D.I. 144](#), 4/7/25]

D. [REDACTED] Warner Bros. Entertainment Inc.'s Objection to the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final hearing, and (VI) Granting Related Relief [[D.I. 151](#), 4/7/25]

H. Warner Bros. Entertainment Inc.'s Witness and Exhibit List for April 11, 2025 Hearing [[D.I. 152](#), 4/8/25]

I. Debtors' Witness and Exhibit List [[D.I. 154](#), 4/8/25]

E. The Official Committee of Unsecured Creditors' Witness and Exhibit List [[D.I. 155](#), 4/8/25]

Status: This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).

MATTERS UNDER CERTIFICATE OF NO OBJECTION OR CERTIFICATION OF COUNSEL

2. 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. 5](#), 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Interim 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 [[D.I. 62](#), 3/18/25]
- B. Certification of Counsel [[D.I. 161](#), 4/9/25]
- C. 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 [[D.I. 167](#), 4/9/25]**

Objections Filed:

- A. Informal response from the Official Committee of Unsecured Creditors

Status: **An order has been entered.**

3. Debtors' Motion for an Order Authorizing the Filing Under Seal of the Declaration of Keith Maib in Support of First Day Relief [[D.I. 22](#), 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Certificate of No Objection [[D.I. 164](#), 4/9/25]
- B. Order Authorizing the Filing Under Seal of the Declaration of Keith Maib in Support of First Day Relief [[D.I. 166](#), 4/9/25]**

Objections Filed: None

Status: **An order has been entered.**

4. Debtors' Motion for Entry of an Order (I) Authorizing the Rejection of Certain Unexpired Leases Effective as of the Petition Date, and (II) granting Related Relief [[D.I. 23](#), 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

A. Certification of Counsel [[D.I. 162](#), 4/9/25]

B. Order (I) Authorizing the Rejection of Certain Unexpired Leases Effective as of the Petition Date, and (II) Granting Related Relief [[D.I. 168](#), 4/9/25]

Objections Filed:

A. Informal Responses

- i. Landlord
- ii. Official Committee of Unsecured Creditors

Status: **An order has been entered.**

5. Debtors' Motion for Entry of an Order (I) Extending the Time to File Schedules and Statements of Financial Affairs and (II) Granting Related Relief [[D.I. 115](#), 3/28/25]

Objection Deadline: April 4, 2025 at 4:00 p.m. (ET)

Related Documents:

A. Certification of Counsel [[D.I. 163](#), 4/9/25]

B. Order (I) Extending the Time to File Schedules and Statements of Financial Affairs and (II) Granting Related Relief [[D.I. 169](#), 4/9/25]

Objections Filed:

A. Informal response from the Official Committee of Unsecured Creditors

Status: **An order has been entered.**

MATTERS GOING FORWARD

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and Related Obligations, (II) Authorizing Banks to Honor Process Check and Electronic Transfer Requests Related Thereto, and (III) Granting Related Relief [[D.I. 6](#), 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

A. Interim Order (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and Related Obligations, (II) Authorizing Banks to Honor Process Check and

Electronic Transfer Requests Related Thereto, and (III) Granting Related Relief [D.I. 64, 3/18/25]

Objections Filed:

A. Informal Responses

i. Official Committee of Unsecured Creditors

B. Warner Bros. Entertainment Inc.'s Omnibus Limited Objection and Reservation of Rights to Various Other Second Day Hearing Relief [D.I. 146, 4/7/25]

Status: This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).

7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue Intercompany Transactions; (II) Confirming Administrative Expense Priority for Postpetition Intercompany Claims; and (III) Granting Related Relief [D.I. 7, 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue Intercompany Transactions; (II) Confirming Administrative Expense Priority for Postpetition Intercompany Claims; and (III) Granting Related Relief [D.I. 67, 3/18/25]

Objections Filed:

A. Informal Responses

- i. Magnum
- ii. ABS Noteholders
- iii. City National Bank
- iv. Official Committee of Unsecured Creditors

B. Warner Bros. Entertainment Inc.'s Omnibus Limited Objection and Reservation of Rights to Various Other Second Day Hearing Relief [D.I. 146, 4/7/25]

Status: This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [D.I. 8, 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [[D.I. 63](#), 3/18/25]

Objections Filed:

- A. Informal Response from Official Committee of Unsecured Creditors
- B. Warner Bros. Entertainment Inc.'s Omnibus Limited Objection and Reservation of Rights to Various Other Second Day Hearing Relief [[D.I. 146](#), 4/7/25]

Status: **This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).**

- 9. Debtors' Motion for Entry of Orders (I)(A) Approving Bid Procedures for the Sale of the Debtors' Assets, (B) Authorizing the Debtors' Entry into the Stalking Horse APA and Approving Bid Protections Thereunder, (C) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (D) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, and (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[D.I. 11](#), 3/17/25]

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Notice of Motion [[D.I. 32](#), 3/17/25]
- B. [SEALED] Declaration of Wayne M. Smith in Support of Warner Bros. Entertainment Inc.'s Objections to (X) the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief, and (Y) the Debtors' Motion for Entry of Orders (I)(A) Approving Bid Procedures for the Sale of the Debtors' Assets, (B) Authorizing the Debtors' Entry into the Stalking Horse APA and Approving Bid Protections Thereunder, (C) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (D) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances,

and (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [D.I. 147, 4/7/25]

- C. [REDACTED] Declaration of Wayne M. Smith in Support of Warner Bros. Entertainment Inc.'s Objections to (X) the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief, and (Y) the Debtors' Motion for Entry of Orders (I)(A) Approving Bid Procedures for the Sale of the Debtors' Assets, (B) Authorizing the Debtors' Entry into the Stalking Horse APA and Approving Bid Protections Thereunder, (C) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (D) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, and (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[D.I. 150](#), 4/7/25]

Objections Filed:

A. Informal Responses

- i. Magnum
- ii. ABS Noteholders
- iii. U.S. Trustee
- iv. DIP Lenders
- v. ABS Trustee
- vi. Official Committee of Unsecured Creditors

- B. Omnibus Limited Objection and Reservation of Rights by the Directors Guild of America, Inc., Screen Actors Guild-American Federation of Television and Radio Artists, The Writers Guild of America, West, Inc., Their Respective Pension and Health Plans, and the Motion Picture Industry Pension and Health Plans to (I) Debtors' Motion for Entry of Orders (I) (A) Approving Bid Procedures for the Sale of the Debtors' Assets, (B) Authorizing the Debtors' Entry into the Stalking Horse APA and Approving Bid Protections Thereunder, (C) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (D) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, and (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[D.I. 126](#), 4/3/25]

- C. [SEALED] Warner Bros. Entertainment Inc.'s Objection to the Debtors' Motion For Entry Of Orders (I)(A) Approving Bid Procedures For The Sale Of The Debtors Assets, (B) Authorizing The Debtors' Entry Into The Stalking Horse APA And

Approving Bid Protections Thereunder, (C) Scheduling An Auction For, And Hearing To Approve, Sale Of The Debtors' Assets, (D) Approving Form And Manner Of Notices Of Sale, Auction, And Sale Hearing, And (E) Approving Assumption And Assignment Procedures; (II)(A) Approving The Sale Of The Debtors' Assets Free And Clear Of All Liens, Claims, Interests, And Encumbrances, And (B) Approving Assumption And Assignment Of Executory Contracts And Unexpired Leases; And (III) Granting Related Relief [D.I. 145, 4/7/25]

- D. [REDACTED] Warner Bros. Entertainment Inc.'s Objection to the Debtors' Motion For Entry Of Orders (I)(A) Approving Bid Procedures For The Sale Of The Debtors Assets, (B) Authorizing The Debtors' Entry Into The Stalking Horse APA And Approving Bid Protections Thereunder, (C) Scheduling An Auction For, And Hearing To Approve, Sale Of The Debtors' Assets, (D) Approving Form And Manner Of Notices Of Sale, Auction, And Sale Hearing, And (E) Approving Assumption And Assignment Procedures; (II)(A) Approving The Sale Of The Debtors' Assets Free And Clear Of All Liens, Claims, Interests, And Encumbrances, And (B) Approving Assumption And Assignment Of Executory Contracts And Unexpired Leases; And (III) Granting Related Relief [D.I. 149, 4/7/25]

Status: This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).

10. Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief [D.I. 113, 3/28/25]

Objection Deadline: April 4, 2025 at 4:00 p.m. (ET)

Related Documents: None

Objections Filed:

A. Informal Responses

i. Official Committee of Unsecured Creditors

B. Warner Bros. Entertainment Inc.'s Omnibus Limited Objection and Reservation of Rights to Various Other Second Day Hearing Relief [D.I. 146, 4/7/25]

Status: This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).

11. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [D.I. 114, 3/28/25]

Objection Deadline: April 4, 2025 at 4:00 p.m. (ET)

Related Documents: None

Objections Filed:

A. Informal Responses

- i. U.S. Trustee
- ii. Official Committee of Unsecured Creditors

B. Warner Bros. Entertainment Inc.'s Omnibus Limited Objection and Reservation of Rights to Various Other Second Day Hearing Relief [[D.I. 146](#), 4/7/25]

Status: **This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).**

12. Debtors' Motion for Entry of an Order (I) Authorizing the Assumption of Certain Contracts with Green Hasson & Janks LLP, (II) Fixing Cure Costs in Relation Thereto, and (III) Granting Related Relief [[D.I. 116](#), 3/28/25]

Objection Deadline: April 4, 2025 at 4:00 p.m. (ET)

Related Documents: None

Objections Filed:

A. Informal Responses

- i. U.S. Trustee
- ii. Official Committee of Unsecured Creditors

B. Warner Bros. Entertainment Inc.'s Omnibus Limited Objection and Reservation of Rights to Various Other Second Day Hearing Relief [[D.I. 146](#), 4/7/25]

Status: **This matter is adjourned to April 16, 2025 at 2:00 p.m. (ET).**

[Remainder of Page Intentionally Left Blank]

Dated: April 9, 2025
Wilmington, Delaware

/s/ Joseph M. Mulvihill

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

Joseph M. Mulvihill (Del. Bar No. 6061)
Carol E. Thompson (Del. Bar No. 6936)
Benjamin C. Carver (Del. Bar No. 7176)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: jmulvihill@ycst.com
cthompson@ycst.com
bcarver@ycst.com

*Proposed Co-Counsel for the Debtors and
Debtors in Possession*

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

Justin R. Bernbrock (admitted *pro hac vice*)
Matthew T. Benz (admitted *pro hac vice*)
321 North Clark Street, 32nd Floor
Chicago, Illinois 60654
Telephone: (312) 499-6300
Facsimile: (312) 499-6301
Email: jbernbrock@sheppardmullin.com
mbenz@sheppardmullin.com

-and-

Jennifer L. Nassiri (admitted *pro hac vice*)
1901 Avenue of the Stars, Suite 1600
Los Angeles, CA 90067
Telephone: (310) 228-3700
Facsimile: (310) 228-3701
Email: jnassiri@sheppardmullin.com

-and-

Alyssa Paddock (admitted *pro hac vice*)
30 Rockefeller Plaza, 39th Floor
New York, NY 10112
Telephone: (212) 653-8700
Facsimile: (212) 653-8701
Email: apaddock@sheppardmullin.com

*Proposed Co-Counsel for the Debtors and
Debtors in Possession*