

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 SECOND AMENDED² AGENDA FOR HEARING OF MATTERS
SCHEDULED FOR APRIL 22, 2025 AT 2:00 P.M. (ET)**

**THE HEARING WILL BE HELD
IN COURTROOM NO. 7.**

**THIS PROCEEDING WILL BE CONDUCTED IN-PERSON. ALL COUNSEL AND
WITNESSES ARE EXPECTED TO ATTEND UNLESS PERMITTED TO APPEAR
REMOTELY VIA ZOOM. PLEASE REFER TO JUDGE HORAN'S CHAMBERS
PROCEDURES AND THE COURT'S WEBSITE
([HTTPS://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES](https://www.deb.uscourts.gov/ecourt-appearances)) FOR
INFORMATION ON WHO MAY PARTICIPATE REMOTELY, THE METHOD OF
ALLOWED PARTICIPATION (VIDEO OR AUDIO), JUDGE HORAN'S
EXPECTATIONS OF REMOTE PARTICIPANTS, AND THE ADVANCE
REGISTRATION REQUIREMENTS.**

**REGISTRATION IS REQUIRED BY 4:00 P.M. (EASTERN TIME) THE BUSINESS
DAY BEFORE THE HEARING UNLESS OTHERWISE NOTICED USING THE
ECOURT APPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE.**

RESOLVED MATTERS

1. 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)

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.**



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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]
- B. Certification of Counsel [D.I. 182, 4/15/25]
- C. Final 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. 187, 4/15/25]

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: An order has been entered.

- 2. 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]
- B. Certification of Counsel [D.I. 181, 4/15/25]
- C. Final 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. 186, 4/15/25]

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: An order has been entered.

- 3. 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:

- A. Certification of Counsel [D.I. 183, 4/15/25]
- B. Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief [D.I. 188, 4/15/25]

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: An order has been entered.

- 4. 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:

- A. Certification of Counsel [D.I. 184, 4/15/25]
- B. Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [D.I. 192, 4/16/25]

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: an order has been entered.

5. 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:

- A. Certification of Counsel [D.I. 185, 4/15/25]
- B. 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. 189, 4/15/25]

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: An order has been entered.

MATTERS SUBMITTED UNDER CERTIFICATION OF COUNSEL

6. Debtors' Application for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Co-Counsel for the Debtors, Effective as of the Petition Date [[D.I. 119](#), 3/31/25]

Objection Deadline: April 14, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Certification of Counsel [[D.I. 200](#), 4/17/25]

- B. Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Co-Counsel for the Debtors, Effective as of the Petition Date [D.I. 207, 4/17/25]

Objections Filed:

- A. Informal comments from the U.S. Trustee

Status: An order has been entered.

- 7. Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global, as Administrative Advisor to the Debtors, Effective as of the Petition Date; and (II) Granting Related Relief [D.I. 120, 3/21/25]

Objection Deadline: April 14, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Certification of Counsel [D.I. 201, 4/17/25]
- B. Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global, as Administrative Advisor to the Debtors, Effective as of the Petition Date [D.I. 208, 4/17/25]

Objections Filed:

- A. Informal comments from the U.S. Trustee

Status: An order has been entered.

- 8. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Retain Accordion Partners, LLC, (II) Designating Keith Maib as Chief Restructuring Officer, Effective as of the Petition Date, and (III) Granting Related Relief [D.I. 121, 3/31/25]

Objection Deadline: April 14, 2025 at 4:00 p.m. (ET). Extended for the U.S. Trustee through April 17, 2025.

Related Documents:

- A. Certification of Counsel [D.I. 202, 4/17/25]
- B. Order (I) Authorizing the Debtors to Retain Accordion Partners, LLC, (II) Designating Keith Maib as Chief Restructuring Officer, Effective as of the Petition Date, and (III) Granting Related Relief [D.I. 209, 4/17/25]

Objections Filed:

- A. Informal Responses

- i. U.S. Trustee
- ii. Warner Bros. Entertainment Inc.

Status: An order has been entered.

9. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Sheppard, Mullin, Richter & Hampton LLP as Counsel to the Debtors and Debtors in Possession, Effective as of the Petition Date [[D.I. 122](#), 3/31/25]

Objection Deadline: April 14, 2025 at 4:00 p.m. (ET). Extended for the U.S. Trustee through April 17, 2025.

Related Documents:

- A. Supplemental Declaration of Justin R. Bernbrock in Support of the Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Sheppard, Mullin, Richter & Hampton LLP as Counsel to the Debtors and Debtors in Possession, Effective as of the Petition Date [[D.I. 203](#), 4/17/25]
- B. Certification of Counsel [[D.I. 204](#), 4/17/25]
- C. Order Authorizing the Retention and Employment of Sheppard, Mullin, Richter & Hampton LLP as Counsel to the Debtors and Debtors in Possession, Effective as of the Petition Date [[D.I. 210](#), 4/17/25]

Objections Filed:

- A. Informal comments from the U.S. Trustee

Status: An order has been entered.

MATTERS GOING FORWARD

10. 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
- v. U.S. Trustee

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: The Debtors anticipate submitting a revised order under certification of counsel in advance of the hearing. This matter is going forward.

11. 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]
- 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, ad (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, ad (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]
- H. Debtors' Witness and Exhibit List [D.I. 176, 4/11/25]
- I. DIP Lenders Witness and Exhibit List [D.I. 156, 4/8/25]**
- J. [SEALED] Debtors' Reply in Support of the DIP Motion [D.I. 219, 4/21/25]
- K. [REDACTED] Debtors' Reply in Support of the DIP Motion [D.I. 220, 4/21/25]
- L. Notice of Filing of Revised Proposed Final DIP Order [D.I. 221, 4/21/26]
- M. DIP Lenders' Joinder to the Debtors' Reply in Support of the DIP Motion [D.I. 222, 4/21/25]
- N. Debtors' Motion for Entry of an Order Granting the Debtors and DIP Lenders Leave and Permission to File Their Respective Replies in Response to the DIP Objection of Warners Bros. Entertainment Inc. [D.I. 223, 4/21/25]

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]

Status: The Debtors are in discussions regarding a global resolution. This matter is going forward.

- 12. 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]
- D. Declaration of Reid Snellenbarger in Support of 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. 198](#), 4/16/25]

E. Notice of Revised Bidding Procedures Order [[D.I. 224](#), 4/21/25]

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]

E. Limited Objection and Reservation of Rights of Magnum Films SPC to Bidding Procedures Motion [D.I. 175, 4/10/25]

Status: The Debtors have filed a revised proposed order and believe the informal comments will be resolved in advance of the hearing. This matter is going forward.

13. Debtors' Supplemental Motion for Entry of an Order (A) Approving (I) the Debtors' Designation of the New Stalking Horse Bidder for the Library Assets as Set Forth in the Stalking Horse Agreement, (II) the Debtors' Entry into the Stalking Horse Agreement, and (III) the Bid Protections and (B) Granting Related Relief [D.I. 197, 4/16/25]

Requested Objection Deadline: At the hearing

Related Document:

- A. Motion to Shorten [D.I. 199, 4/16/25]
- B. Order Shortening the Notice Period [D.I. 206, 4/17/25]
- C. Notice of Filing of Revised Alcon Stalking Horse APA [D.I. 214, 4/18/25]

Status: This matter is going forward.

ADDITIONAL MATTER

14. **Debtors' Motion for an Order Authorizing the Filing Under Seal of the Debtors' Reply in Support of the DIP Motion [D.I. 227, 4/21/25]**

Objection Deadline: At the hearing

Status: This matter is going forward

Dated: April 22, 2025
Wilmington, Delaware

/s/ Joseph M. Mulvihill

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

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