

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., <i>et al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	<b>Objection Deadline: August 5, 2025 at 4:00 p.m. (ET)</b>
	)	<b>Hearing Date: August 26, 2025 at 10:00 a.m. (ET)</b>

---

**SUPPLEMENT TO FIRST INTERIM FEE REQUEST OF  
YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Young Conaway Stargatt & Taylor, LLP ("Young Conaway"), co-counsel to the above-captioned debtors and debtors in possession (collectively, the "Debtors"), hereby supplements the *First Interim Fee Request of Young Conaway Stargatt & Taylor, LLP* (the "First Interim Application") for the period from March 17, 2025, through and including May 31, 2025 (the "Application Period") by attaching, as **Exhibits A** through **E** hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the "UST Guidelines"). In addition, Young Conaway respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

- a. During the Application Period, Young Conaway did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms.

---

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>.



- b. The fees sought by Young Conaway in the First Interim Application are less than 10% higher than the fees budgeted in the budget provided by Young Conaway to the Debtors for Application Period.
- c. The professionals included in the First Interim Application did not vary their hourly rate based on the geographic location of the bankruptcy cases.
- d. The First Interim Application did not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.
- e. The time covered by the First Interim Application includes approximately 0.00 hours with a value of \$0.00 spent by Young Conaway to ensure that the time entries subject to the First Interim Application comply with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Young Conaway's preparation of each monthly fee application.
- f. The First Interim Application did not include any rate increases since the effective date of the Court's approval of Young Conaway's retention.

Dated: July 15, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ Joseph M. Mulvihill

**YOUNG CONAWAY STARGATT &  
TAYLOR, LLP**

Joseph M. Mulvihill (Del. Bar No. 6061)  
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  
bcarver@ycst.com

*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, 32<sup>nd</sup> Floor  
Chicago, IL 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, 39<sup>th</sup> Floor  
New York, NY 10112  
Telephone: (212) 653-8700  
Facsimile: (212) 653-8701  
Email: apaddock@sheppardmullin.com

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

**EXHIBIT A****CUSTOMARY AND COMPARABLE  
COMPENSATION DISCLOSURES**

Young Conaway's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by similarly skilled bankruptcy attorneys. In addition, Young Conaway's hourly rates for bankruptcy services are comparable to the rates charged by the Firm for other complex corporate and litigation matters. The rates charged by the Firm for the services performed in the prior calendar year in the practice areas that are comparable to the services performed by the Bankruptcy and Corporate Restructuring section – namely, Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation -are set forth below. Also included below is 2024 blended hourly rate information for all sections of the Firm, excluding the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

<b>Category of Timekeeper</b>	<b>Blended Hourly Rate</b>		
	<b>Billed</b> In comparable practice areas for preceding calendar year <sup>1</sup>	<b>Billed</b> Firm-wide for preceding calendar year <sup>2</sup>	<b>Billed</b> This Application
Partner	\$971	\$998	\$896
Counsel	\$773	\$685	N/A
Associate	\$551	\$542	\$535
Paralegal	\$359	\$235	\$394
<b>Aggregated:</b>	\$715	\$705	\$632

---

1 This column reflects the blended 2024 rates charged by the firm for complex corporate and litigation matters in the following sections of the firm: Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation.

2 This column excludes blended hourly rates for the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

**EXHIBIT B****SUMMARY OF TIMEKEEPERS INCLUDED IN THE  
FIRST INTERIM APPLICATION**

<b>Name</b>	<b>Title</b>	<b>Department</b>	<b>Date of First Admission</b>	<b>Fees Billed in the Application Period (\$)</b>	<b>Hours Billed in the Application Period</b>	<b>Hourly Rate Billed in the Application Period (\$)</b>
Joseph M. Barry	Partner	Bankruptcy	2001	\$1,358.50	1.00	\$1,235.00
James Higgins	Partner	Corporate	2007	\$19,097.00	16.90	\$1,130.00
Michael S. Neiburg	Partner	Bankruptcy	2009	\$8,922.50	8.30	\$1,075.00
Joseph M. Mulvihill	Partner	Bankruptcy	2015	\$141,212.00	164.20	\$860.00
Christopher M. Lambe	Associate	Bankruptcy	2022	\$ 4,964.00	7.30	\$680.00
Carol E. Thompson	Associate	Bankruptcy	2022	\$40,658.00	70.10	\$580.00
Benjamin C. Carver	Associate	Bankruptcy	2023	\$58,298.00	113.20	\$515.00
Brynna M. Gaffney	Associate	Bankruptcy	2024	\$28,350.00	56.70	\$500.00
Debbie Laskin	Paralegal	Bankruptcy		\$29,111.50	73.70	\$395.00
Brenda Walters	Paralegal	Bankruptcy		\$12,758.50	32.30	\$395.00
Hubert T. Hannagan	Paralegal	Bankruptcy		\$1,730.50	4.50	\$385.00
Samantha Rash	Paralegal			\$300.00	0.80	\$375.00
<b>Totals</b>				<b>\$346,760.50</b>	<b>549.00</b>	

**EXHIBIT C**

**BUDGET AND STAFFING PLAN**

<b>BUDGET</b> <b>\$400,000.00</b>		
<b>Project Category</b>	<b>Estimated Hours</b>	<b>Estimated Fees</b>
Case Administration (B001)	77.40	\$47,664.00
Court Hearings (B002)	103.20	\$63,552.00
Cash Collateral/DIP Financing (B003)	32.30	\$19,860.00
Schedules & Statements, U.S. Trustee Reports (B004)	38.70	\$23,832.00
Lease/Executory Contract Issues (B005)	12.90	\$7,944.00
Use, Sale or Lease of Property (363 issues) (B006)	90.30	\$55,608.00
Claims Analysis, Objections and Resolutions (B007)	12.90	\$7,944.00
Meetings (B008)	25.80	\$15,888.00
Stay Relief Matters (B009)	6.50	\$3,972.00
Reclamation Claims and Reclamation Adversaries (B010)	6.50	\$3,972.00
Other Adversary Proceedings (B011)	6.50	\$3,972.00
Plan and Disclosure Statement (B012)	51.60	\$31,776.00
Creditor Inquiries (B013)	6.50	\$3,972.00
General Corporate Matters (B014)	6.50	\$3,972.00
Employee Matters (B015)	12.90	\$7,944.00
Asset Analysis (B016)	6.50	\$3,972.00
Retention of Professionals/Fee Issues (B017)	109.70	\$67,524.00
Fee Application Preparation (B018)	19.40	\$11,916.00
Travel (B019)	6.50	\$3,972.00
Utility Services (B020)	12.90	\$7,944.00
<b>Total</b>	<b>645.50</b>	<b>\$397,200.00</b>

<b>STAFFING PLAN</b>		
<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Work on the Matter During the Budgeted Period</b>	<b>Average Rate<sup>1</sup></b>
Partner	2	\$892.75
Counsel	-	-
Associate (7 or more years since first admission)	-	-
Associate (4-6 years since first admission)	-	-
Associate (less than 4 years since first admission)	2	\$508.76
Paralegal	2	\$395.00

<sup>1</sup>The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the Budgeted Period.



**EXHIBIT D****SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT**

<b>SUMMARY OF COMPENSATION BY PROJECT CATEGORY</b>		
<b>Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought (\$)</b>
Case Administration (B001)	34.50	\$14,986.50
Court Hearings (B002)	105.10	\$68,181.50
Cash Collateral/DIP Financing (B003)	42.90	\$33,428.50
Schedules & Statements, U.S. Trustee Reports (B004)	109.00	\$61,764.00
Lease/Executory Contract Issues (B005)	16.40	\$8,142.50
Use, Sale or Lease of Property (B006)	114.50	\$83,859.50
Claims Analysis, Objections & Resolutions (B007)	9.40	\$5,825.50
Meetings (B008)	13.40	\$10,060.00
Stay Relief Matters (B009)	0.50	\$430.00
Other Adversary Matters (B011)	1.30	\$792.00
Plan and Disclosure Statement (B012)	1.00	\$860.00
General Corporate Matters (B014)	1.30	\$513.50
Employee Matters (B015)	1.20	\$505.50
Retention of Professionals/Fee Issues (B017)	87.70	\$50,405.00
Fee Application Preparation (B018)	5.40	\$2,523.50
Travel (B019)	4.50	\$3,870.00
(B190)	1.00	\$615.00
<b>Totals</b>	<b>549.10</b>	<b>\$346,762.50</b>

<b>SUMMARY OF EXPENSE REIMBURSEMENT</b>	
	<b>Amount (\$)</b>
Air/Rail Travel	\$1,249.96
Car/Bus	\$340.28
Computerized Legal Research	\$131.28
Delivery	\$211.00
Docket Retrieval	\$78.70
Filing Fee	\$400.00
Hotel/Lodging	\$3,723.50
Reproduction	\$4,009.60
Transcript	\$71.05
Working Meals	\$1,469.68
<b>Total</b>	<b>\$11,685.05</b>

**EXHIBIT E**

<b>SUMMARY OF FIRST INTERIM APPLICATION</b>	
Name of Applicant	Young Conaway Stargatt & Taylor, LLP
Name of Client	Debtors and Debtors in Possession
Time period covered by First Interim Application	March 17, 2025 – May 31, 2025
Total compensation sought during the Application Period	\$346,762.50
Total expenses sought during the Application Period	\$11,685.05
Petition Date	March 17, 2025
Retention Date	March 17, 2025
Date of order approving employment	April 17, 2025
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date	\$277,410.00
Total allowed expenses paid to date	\$11,685.05
Blended rate in the First Interim Application for all attorneys	\$692.00
Blended rate in the First Interim Application for all timekeepers	\$632.00
Compensation sought in the First Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed (80%)	\$205,437.20
Expenses sought in the First Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed (100%)	\$6,135.04
Number of professionals included in the First Interim Application	12
If applicable, number of professionals in the First Interim Application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought during the Application Period	Budget Amount: \$400,000.00 Amount Sought: \$346,762.50
Number of professionals billing fewer than 15 hours to the case during the Application Period	5
Are any rates higher than those approved or disclosed at retention?	No