

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|--|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| VILLAGE ROADSHOW ENTERTAINMENT |) | |
| GROUP USA INC., <i>et al.</i> , ¹ |) | Case No. 25-10475 (TMH) |
| |) | |
| |) | (Jointly Administered) |
| Debtors. |) | |
| |) | |

**NOTICE OF AMENDED² AGENDA FOR HEARING OF MATTERS
SCHEDULED FOR AUGUST 26, 2025 AT 10:00 A.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://ECF.DEB.USCOURTS.GOV/CGI-BIN/NYSBAPPEARANCES.PL](https://ecf.deb.uscourts.gov/cgi-bin/nysbappearances.pl)) 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.

ADJOURNED MATTER

1. Motion of Regency Entertainment (USA), Inc. for Authority to File Under Seal its Objection to Seal of Debtors' Assets, Objection to Assumption and Assignment of Co-Ownership Agreement, and Declaration of David C. Friedman in Support [[D.I. 480, 6/5/25](#)]

Objection Deadline: At the hearing

Related Documents: None.

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.**



251047525082200000000006

Objections Filed: None to date

Status: This matter is adjourned to October 20, 2025 at 10:00 a.m. (ET).

RESOLVED MATTER

2. Debtors' Motion for Entry of an Order, Pursuant to 1121(d) of the Bankruptcy Code, Extending the Exclusive Periods Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof [D.I. 634, 7/11/25]

Objection Deadline: July 25, 2025 at 4:00 p.m. (ET)

Related Documents:

A. Certificate of No Objection [D.I. 705, 7/31/25]

B. Order [D.I. 707, 8/1/25]

Objections Filed: None

Status: An order has been entered.

CONTESTED MATTER GOING FORWARD

3. 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: May 12, 2025 at 4:00 p.m. (ET), extended for certain parties

Related Documents:

- A. 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]

- B. Amended Order (I) Approving Bid Procedures for the Sale of the Debtors' Assets, (II) Authorizing the Debtors' Entry Into the Stalking Horse APA and Approving Bid Protections There under, (III) Scheduling an Auction for, and Hearing to Approve, Sale of the Debtors' Assets, (IV) Approving Form and Manner of Notices of Sale, Auction, and Sale Hearing, (V) Approving Assumption and Assignment Procedures, and (VI) Granting Related Relief [[D.I. 276](#), 4/24/25]
- C. Notice of Possible Assumption and Assignment of Certain Executory Contracts [[D.I. 293](#), 4/28/25]
- D. Affidavit of Publication of the Notice of Sale, Bid Procedures, Potential Auction, and Sale Hearing in the Wall Street Journal and Los Angeles Times [[D.I. 295](#), 4/30/25]
- E. Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts [[D.I. 297](#), 4/30/25]
- F. Second Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts [[D.I. 345](#), 5/16/25]
- G. Notice of Filing of Proposed Sale Order [[D.I. 438](#), 5/27/25]
- H. Notice of (I) Successful Bidder for Derivative Rights and Studio Business and (II) Back-Up Bidder for Derivative Rights [[D.I. 446](#), 5/28/25]
- I. [SEALED] Declaration in Support Declaration of David C. Friedman in Support of Objections By Regency Entertainment (USA), Inc. to Sale of Debtors' Assets and Assumption and Assignment of Co-Ownership Agreement [[D.I. 479](#), 6/5/25]
- J. [REDACTED] Declaration of David C. Friedman in Support of Objections by Regency Entertainment (USA), Inc. to Sale of Debtors' Assets and Assumption and Assignment of Co-Ownership Agreement [[D.I. 483](#), 6/5/25]
- K. Third Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts [[D.I. 510](#), 6/13/25]
- L. [SEALED] Declaration of Wayne M. Smith in Support of Warner Bros. Entertainment Inc.'s Omnibus Objection to (I) the Debtors' Motion for an Order Approving the Sale of the Debtors' Assets, (II) the Debtors' Sale Supplement With Respect Thereto, and (III) the Debtors' Assumption and Assignment of Certain Warner Bros. Agreements; and (B) the Declaration of Wayne M. Smith in Support Thereof [[D.I. 519](#), 6/13/25]
- M. [REDACTED] Declaration of Wayne M. Smith in Support of Warner Bros. Entertainment Inc.'s Omnibus Objection to (I) the Debtors' Motion for an Order Approving the Sale of the Debtors' Assets, (II) the Debtors' Sale Supplement With Respect Thereto, and (III) the Debtors' Assumption and Assignment of Certain Warner Bros. Agreements; and (B) the Declaration of Wayne M. Smith in Support

Thereof [D.I. 522, 6/13/25]

- N. [SEALED] Warner Bros. Entertainment Inc.'s Reply in Support of its Motion (I) for an Order, Granting Limited Relief from the Automatic Stay to Obtain its Damages Award and Judgment and (II) to Enforce Arbitration Provisions in the Matrix Agreements with the Debtors [D.I. 525, 6/16/25]
- O. Alcon Media Group, LLC's (I) Joinder to the Debtors' Response to Warner Bros. Entertainment Inc.'s Objection to Entry of Derivative Rights Sale Order and (II) Limited Response to Warner Bros. Entertainment Inc.'s Objection [D.I. 528, 6/16/25]
- P. Amended Notice of Further Adjournment of Sale Hearing with Respect to the Derivative Rights Only [D.I. 565, 6/20/25]
- Q. Fourth Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts [D.I. 722, 8/14/25]
- R. Debtors' Witness and Exhibit List [D.I. 765, 8/21/25]
- S. Notice of Filing of Revised Proposed Sale Order for the Studio Assets [D.I. 766, 8/22/25]

Objections Filed:³

- A. 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 (1) 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 and (2) 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

³ The Debtors also received informal comments from certain counterparties whose contracts were listed on Exhibit 1 to the *Notice of Possible Assumption and Assignment of Certain Executory Contracts* [Docket No. 293] (the "Potential Assumed Contracts Schedule"). After engaging with these counterparties, the Debtors have agreed to remove the following contracts from the Potential Assumed Contracts Schedule: (i) the agreement with Stolen Picture listed at line no. 430; (ii) the agreements with 10100 Santa Monica, Inc. listed at line nos. 1-5; (iii) the agreements with Joel Golby listed at line nos. 201-203; (iv) the agreements with Cyan Worlds, Inc. listed at line nos. 116-117; and (v) the agreement with Christine Romero and Sanibel Films, Inc. II listed at line no. 70.

Liens and Superpriority Administrative Expenses Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing and (VI) Granting Related Relief [[D.I. 126, 4/3/25](#)]⁴

- B. Clover Ivy Purchaser, LLC's Objection to Sale of Debtors' Assets [[D.I. 304, 5/5/25](#)]
- C. Clover Ivy Purchaser, LLC's Objection to Assumption and Assignment of Option Agreement [[D.I. 305, 5/5/25](#)]
- D. 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 Sale of Debtors' Assets [[D.I. 323, 5/12/25](#)]
- E. Moonshot Entertainment, Inc's Limited Objection and Reservation of Rights to Sale of the Debtor's Assets and Entry of a Sale Order [[D.I. 328, 5/12/25](#)]
- F. Limited Objection and Reservation of Rights of Magnum Films SPC to Sale of Debtors' Assets [[D.I. 331, 5/12/25](#)]
- G. Objection and Reservation of Rights to the Debtors' Proposed Sale and Assumption and Assignment of Certain Executory Contracts [[D.I. 340, 5/14/25](#)]
- H. Clover Ivy Purchaser, LLC's Renewed Objection to Sale of Debtors' Assets [[D.I. 463, 6/2/25](#)]
- I. [SEALED] Objection by Regency Entertainment (USA), Inc. to Sale of Debtors' Assets [[D.I. 477, 6/5/25](#)]
- J. [SEALED] Objection by Regency Entertainment (USA), Inc. to Assumption and Assignment of Co-Ownership Agreement [[D.I. 478, 6/5/25](#)]
- K. [REDACTED] Objection by Regency Entertainment (USA), Inc. to Sale of Debtors' Assets [[D.I. 481, 6/5/25](#)]
- L. [REDACTED] Objection by Regency Entertainment (USA), Inc. to Assumption and Assignment of Co-Ownership Agreement [[D.I. 482, 6/5/25](#)]
- M. [SEALED] Warner Bros. Entertainment Inc.'s Omnibus Objection to (I) the Debtors' Motion for an Order Approving the Sale of the Debtors' Assets, (II) the Debtors' Sale Supplement with Respect Thereto, and (III) the Debtors' Assumption and Assignment of Certain Warner Bros. Agreements; and (B) the Declaration of Wayne M. Smith in Support Thereof [[D.I. 518, 6/13/25](#)]

⁴ This objection also applies to the *Fourth Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts*.

- N. [REDACTED] Warner Bros. Entertainment Inc.'s Omnibus Objection to (I) the Debtors' Motion for an Order Approving the Sale of the Debtors' Assets, (II) the Debtors' Sale Supplement with Respect Thereto, and (III) the Debtors' Assumption and Assignment of Certain Warner Bros. Agreements; and (B) the Declaration of Wayne M. Smith in Support Thereof [D.I. 521, 6/13/25]

Status: This matter is going forward with respect to the sale of the Studio Business. The objection of Warner Bros. with respect to the sale of the Studio Business is going forward. The objections of the Union Entities⁵ with respect to the sale of the Studio Business are adjourned to the hearing scheduled for September 23, 2025. **The objection of Moonshot Entertainment, Inc. with respect to the sale of the Studio Business is going forward.** The Debtors believe all other objections with respect to the sale of the Studio Business have been resolved⁶. The sale of the Derivative Assets, and any objections related thereto, are adjourned to the hearing scheduled for October 20, 2025, at 10:00 a.m. (ET).

FEE APPLICATIONS

4. Interim Fee Applications

Related Documents: See Schedule 1, attached

- A. Certification of Counsel Regarding Omnibus Order Approving First Interim Fee Applications [D.I. 717, 8/8/25]
- B. Certification of Counsel Regarding Order Approving SOLIC Interim Fee Application for Allowance of the Sale Transaction Fee for the Library Assets [D.I. 721, 8/14/25]
- C. Order Granting First Interim Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP as Counsel for the Official Committee of Unsecured Creditors for the period April 1, 2025 to May 31, 2025 [D.I. 724, 8/19/25]

Objections Filed: None

Status: Orders have been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

⁵ "Union Entities" means 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, as applicable.

⁶ The Debtors also received informal comments from Sony Pictures Entertainment Inc. ("Sony") with respect to the cure amount for the Coproduction Binding Term Sheet, dated September 30, 2022 re: "Underworld" between Debtor Village Roadshow Entertainment Group USA Inc. and Sony Pictures Television Inc. (the "Sony Agreement") listed at line no. 133 of the Fourth Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts [Docket No. 722]. After engaging with Sony, the Debtors agree that the cure amount for the Sony Agreement is \$250,000.00.

Dated: August 22, 2025
Wilmington, Delaware

/s/ Joseph M. Mulvihill

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

Joseph M. Mulvihill (Del. Bar No. 6061)
Benjamin C. Carver (Del. Bar No. 7176)
Brynna M. Gaffney (Del. Bar No. 7402)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: jmulvihill@ycst.com
bcarver@ycst.com
bgaffney@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, 32nd 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, 39th 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*

**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)
)
) **Hearing Date: August 26, 2025 at 10:00 a.m. (ET)**
)
)
)

**SCHEDULE A
INDEX FIRST INTERIM FEE APPLICATIONS**

DEBTORS' PROFESSIONALS

- A. **Young Conaway Stargatt & Taylor, LLP** - First Interim Fee Applications of the Debtors' Professionals for the Period from March 17, 2025 through May 31, 2025 [[D.I. 638, 7/25/25](#)]
1. First Monthly Application for the Period from March 17, 2025 through March 31, 2025 [[D.I. 334, 5/13/25](#)]
 2. Certificate of No Objection [[D.I. 474, 6/4/25](#)]
 3. Second Monthly Application for the Period from April 1, 2025 through April 30, 2025 [[D.I. 538, 6/17/25](#)]
 4. Certificate of No Objection [[D.I. 630, 7/9/25](#)]
 5. Third Monthly Application for the Period May 1, 2025 through May 31, 2025 [[D.I. 623, 7/2/25](#)]
 6. Certificate of No Objection [[D.I. 696, 7/24/25](#)]

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>.

7. Supplement to First Interim Fee Application of Young Conaway Stargatt & Taylor, LLP [[D.I. 640, 7/15/25](#)]
- B. **Sheppard, Mullin, Richter & Hampton LLP** – First Interim Fee Applications of the Debtors’ Professionals for the Period from March 17, 2025 through May 31, 2025 [[D.I. 638, 7/25/25](#)]
1. First Monthly Application for the Period from March 17, 2025 through March 31, 2025 [[D.I. 333, 5/13/25](#)]
 2. Certificate of No Objection [[D.I. 473, 6/4/25](#)]
 3. Second Monthly Application for the Period from April 1, 2025 through April 30, 2025 [[D.I. 610, 6/26/25](#)]
 4. Certificate of No Objection [[D.I. 648, 7/18/25](#)]
 5. Third Monthly Application for the Period May 1, 2025 through May 31, 2025 [[D.I. 623, 7/2/25](#)]
 6. Certificate of No Objection [[D.I. 695, 7/24/25](#)]
 7. Supplement to First Interim Fee Application of Sheppard, Mullin, Richter & Hampton LLP [[D.I. 639, 7/15/25](#)]
- C. **Kirkland & Ellis LLP and Kirkland & Ellis International LLP** - First Interim Fee Applications of the Debtors’ Professionals for the Period from March 17, 2025 through April 30, 2025 [[D.I. 638, 7/25/25](#)]
1. First Monthly Application for the Period from March 17, 2025 through April 30, 2025 [[D.I. 535, 6/17/25](#)]
 2. Certificate of No Objection [[D.I. 629, 7/9/25](#)]
 3. Second Monthly Application for the Period from May 1, 2025 through May 31, 2025 [[D.I. 637, 7/11/25](#)]
 4. Certificate of No Objection [[D.I. 711, 8/4/25](#)]
 5. Supplement to First Interim Fee Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP [[D.I. 641, 7/15/25](#)]
- D. **Solic Capital Advisors, LLC and Solic Capital, LLC** – Interim Fee Application of GBH SOLIC Holdco, LLC and SOLIC Capital, LLC for Allowance of the Sale Transaction Fee for the Library Assets [[D.I. 692, 7/23/25](#)]
1. First Monthly Application for the Period from March 17, 2025 through April 30, 2025 [[D.I. 484, 6/23/25](#)]

2. Certificate of No Objection [[D.I. 624, 7/2/25](#)]
 3. Second Monthly Application for the Period May 1, 2025 through May 31, 2025 [[D.I. 627, 7/8/25](#)]
 4. Certificate of No Objection [[D.I. 704, 7/31/25](#)]
- E. **Kurtzman Carson Consultants, LLC dba Verita Global** - First Interim Fee Applications of the Debtors' Professionals for the Period from March 17, 2025 through May 31, 2025 [[D.I. 638, 7/25/25](#)]
1. First Monthly Application for the Period from March 17, 2025 through March 31, 2025 [[D.I. 501, 6/12/25](#)]
 2. Certificate of No Objection [[D.I. 625, 7/7/25](#)]
 3. Second Monthly Application for the Period from April 1, 2025 through April 30, 2025 [[D.I. 502, 6/12/25](#)]
 4. Certificate of No Objection [[D.I. 626, 7/7/25](#)]
 5. Third Monthly Application for the Period May 1, 2025 through May 31, 2025 [[D.I. 621, 7/2/25](#)]
 6. Certificate of No Objection [[D.I. 694, 7/24/25](#)]

COMMITTEE'S PROFESSIONALS

- F. **Pachulski Stang Ziehl & Jones LLP** - First Interim Fee Applications of the Debtors' Professionals for the Period from March 17, 2025 through May 31, 2025 [[D.I. 642, 7/16/25](#)]
1. First Monthly Application for the Period from April 1, 2025 through April 30, 2025 [[D.I. 455, 5/30/25](#)]
 2. Certificate of No Objection [[D.I. 601, 6/24/25](#)]
 3. Second Monthly Application for the Period from May 1, 2025 through May 31, 2025 [[D.I. 546, 6/18/25](#)]
 4. Certificate of No Objection [[D.I. 633, 7/10/25](#)]