

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

VILLAGE ROADSHOW ENTERTAINMENT  
GROUP USA INC., *et al.*,<sup>1</sup>

Debtors.

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

**CERTIFICATION OF COUNSEL REGARDING THE PROPOSED ORDER  
APPROVING STIPULATION BETWEEN DEBTORS AND EUROPACORP TO  
MODIFY AUTOMATIC STAY**

The undersigned hereby certifies as follows:

1. Village Roadshow Entertainment Group USA Inc. (“VREG”), one of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and EuropaCorp, a subsidiary of Vine Investment Advisors, LP, are parties to a Participation Agreement regarding a program titled “We May Regret This” (aka “We Might Regret This”) (the “Program”) dated as of October 26, 2023 (the “Agreement”).

2. Pursuant to the Agreement, VREG appointed EuropaCorp “as the exclusive sales agent for any and all rights in and to the [Program] for the world excluding the UK.”

3. Both parties agree that the automatic stay should be modified to permit EuropaCorp to perform its duties as exclusive sales agent for the Program consistent with the Agreement. The terms of the Agreement will otherwise remain in full force and effect.

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<sup>1</sup> 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>.



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4. Accordingly, the Parties have entered into a stipulation (the “Stipulation”), which provides that the automatic stay under Bankruptcy Code Section 362 should be modified to allow EuropaCorp to perform its duties.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached as **Exhibit A** approving the Stipulation at its earliest convenience without further notice or a hearing.

*[Signature Page Follows]*

Dated: August 29, 2025  
Wilmington, Delaware

*/s/ Benjamin C. Carver*

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*Co-Counsel for the Debtors and  
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**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

VILLAGE ROADSHOW ENTERTAINMENT  
GROUP USA INC., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10475 (TMH)

(Jointly Administered)

**ORDER APPROVING STIPULATION BETWEEN DEBTORS AND EUROPACORP TO  
MODIFY AUTOMATIC STAY**

Upon consideration of the *Stipulation Between Debtors and EuropaCorp to Modify Automatic Stay*, a copy of which is attached hereto as **Exhibit 1** (the “Stipulation”) and for good and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Stipulation is APPROVED;
2. The automatic stay is modified for the purpose of allowing EuropaCorp to perform its duties as the exclusive sales agent for the “We May Regret This” program, as set forth under the Participation Agreement between EuropaCorp and Village Roadshow Entertainment Group USA Inc.;
3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the interpretation and/or implementation of this Order or the Stipulation; and
4. The terms of this Order are immediately effective and enforceable upon its entry.

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**Exhibit 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

VILLAGE ROADSHOW ENTERTAINMENT  
GROUP USA INC., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10475 (TMH)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS AND EUROPACORP TO MODIFY  
AUTOMATIC STAY**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) and EuropaCorp (together with the Debtors, the “Parties”), by and through their respective undersigned counsel, and subject to approval of the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), hereby stipulate and agree as follows:

WHEREAS, Village Roadshow Entertainment Group USA Inc. (“VREG”) and EuropaCorp are parties to a Participation Agreement regarding a program titled “We May Regret This” dated as of October 26, 2023 (the “Agreement”), a copy of which is annexed hereto as Exhibit A;

WHEREAS, pursuant to Section 3.3 of the Agreement, VREG appointed EuropaCorp “as the exclusive sales agent for any and all rights in and to the [“We May Regret This”] Program for the world excluding the UK”;

WHEREAS, Section 6 of the Agreement provides that VREG is the owner of “We May Regret This”;

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WHEREAS, the Agreement is listed among the contracts that might be assumed and assigned to Alcon Media Group, LLC [Dkt. No. 722]; and

WHEREAS, the Parties thus stipulate and agree as provided herein that the automatic stay under Bankruptcy Code section 362 should be modified to allow EuropaCorp to perform its duties and fulfill its obligations as exclusive sales agent for “We May Regret This,” consistent with the Agreement.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to approval by the Bankruptcy Court, as follows:

1. The Parties shall seek an order of the Bankruptcy Court to modify the automatic stay under Bankruptcy Code Section 362 to allow EuropaCorp to perform as exclusive sales agent under the Agreement and take all reasonably necessary steps to carry out such performance.

2. The Agreement shall otherwise remain in full force and effect until such time it is assumed or rejected pursuant to Bankruptcy Code section 365.

3. This Stipulation constitutes the entire agreement and understanding between the Parties with respect to the subject matter hereof and supersedes all prior agreements. This Stipulation may not be changed, amended, modified, or altered except by written agreement signed by each of the Parties or confirming email exchanged by counsel to the Parties.

4. The Parties, by and through their undersigned counsel, each represent and warrant that the undersigned is fully authorized and empowered to execute and deliver this Stipulation on behalf of, and to bind, each Party, as applicable, to the terms and conditions of this Stipulation.

5. This Stipulation may be executed in any number of counterparts, and each such counterpart is to be deemed an original for all purposes, but all counterparts shall collectively constitute one agreement. Further, electronic signatures or transmissions of an originally signed

document by facsimile or electronic mail shall be as fully binding on the Parties as an original document.

6. The Bankruptcy Court shall have and retain jurisdiction to resolve any disputes or controversies arising from, in connection with, or related to this Stipulation.

7. Notwithstanding the possible application of any Federal Rule of Bankruptcy Procedure to the contrary, the Order approving this Stipulation shall be in full force and effect upon its entry.

*[Signatures follow]*

Dated: August 29, 2025  
Wilmington, Delaware

/s/ Joseph M. Mulvihill

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Dated: August 29, 2025  
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