

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)

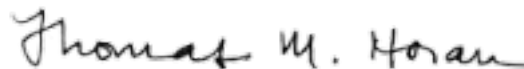
(Jointly Administered)

**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.

Dated: September 2nd, 2025
Wilmington, Delaware


THOMAS M. HORAN
UNITED STATES BANKRUPTCY JUDGE

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>.



251047525090200000000003

Exhibit 1

Stipulation

**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)

**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”;

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>.

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

**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*

Dated: August 29, 2025
Wilmington, Delaware

STEVENS & LEE, P.C.

/s/ Joseph H. Huston, Jr.

Joseph H. Huston, Jr. (No. 4035)

919 North Market Street

Suite 1300

Wilmington, DE 19801

(302) 425-3310

jhh@stevenslee.com

Local Counsel to EuropaCorp

COOLEY LLP

/s/ Daniel S. Shamah

Daniel S. Shamah (admitted *pro hac vice*)

55 Hudson Yards

New York, NY 10001-2157

(212) 479-6000

dshamah@cooley.com

Counsel to EuropaCorp