

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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|--|---|-------------------------|
| 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.                                     | ) |                         |
|  | ) |                         |

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**NOTICE OF RULE 30(b)(6) DEPOSITION OF**  
**WARNER BROS. ENTERTAINMENT INC.**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Rule 7030 of the Federal Rules of Bankruptcy Procedure, and the *Agreed Scheduling Order for the Pending Contested Matter Regarding the Sale of the Debtors' Derivative Rights Assets* [Docket No. 518], the above-captioned debtors and debtors in possession (collectively "Debtors") hereby notice the deposition upon oral examination, to be recorded by video and stenographic means, of **Warner Bros. Entertainment Inc.** ("Warner Bros."). The deposition shall commence on **October 3, 2025, at 9:00 a.m. PT.** Warner Bros.' designee or designees shall be prepared to testify regarding the topics listed in **Exhibit 1** attached hereto.

PLEASE TAKE FURTHER NOTICE that this deposition will be conducted remotely. The deposition shall be taken before a court reporter who is authorized to administer oaths, and may continue until completed or if not completed on the noticed date, it will be continued to a subsequent agreed upon date.

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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>.



The deposition will be for the purposes of discovery, for use at any hearing or trial in this matter, and for any other purpose permitted under the Federal Rules of Civil Procedure, Federal Rules of Bankruptcy Procedure, and Local Rules or any other applicable law, rule, statute, or regulation. Further, the deposition transcript may be used for the purposes of discovery, or as evidence offered at any hearing or trial, or for any and all purposes allowed by law, rule, statute, or regulation.

*[Remainder of Page Intentionally Left Blank]*

Dated: September 19, 2025

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Respectfully submitted:

/s/ Thomas V. Panoff

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**CERTIFICATE OF SERVICE**

The undersigned certifies that, on September 19, 2025, a copy of the foregoing document was served by email on counsel for Warner Bros. Entertainment, Inc.

By: /s/ Thomas V. Panoff  
Thomas V. Panoff

**Exhibit A**

**DEFINITIONS**

The following definitions shall apply to each topic below, unless specifically indicated, or otherwise required, by the context of the topic:

1. “Warner Bros.” “You,” or “your” refer to Warner Bros. Entertainment Inc. and its affiliates, and any of its respective representatives, including any person or entity to which it has assigned any of its rights or interests in this litigation.

2. “Village” refers to the Debtors.

3. “Alcon” refers to Alcon Media Group, LLC.

4. “Action” refers to the above-captioned matter, *In re Village Roadshow Entertainment Group USA Inc.*, Case No. 25-10475-TMH, pending in the U.S. Bankruptcy Court for the District of Delaware.

5. “Bid Procedures Order” refers to the *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 Thereunder, (III) Scheduling an Auction for, and Hearing to Approving, 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* [Docket No. 276].

6. “Communications,” “communicated,” and “communicate” means any exchange or transfer of information whether written, oral, graphic, electronic or in any other form, including metadata. For the avoidance of doubt, “Communications” includes, but is not limited to, any correspondence, e-mail, text, SMS message, instant message (including but not limited to WhatsApp, Zoom, Skype, Google Chats, LinkedIn Messenger, Facebook Messenger, Snapchat,

Slack, and Microsoft Teams), social media posting, commenting, or messaging (including, but not limited to, Facebook, Twitter/X, Instagram, YouTube, TikTok, LinkedIn, Reddit, and Snapchat), memorandum, interview, conference, meeting, or telephone conversation.

7. “Derivative Rights” means, with respect to each Picture, all rights throughout the world to produce remakes, sequels, and prequels of the Picture and to distribute and otherwise exploit such remakes, sequels, or prequels for viewing in any medium or media now known or hereafter devised, whether in theatres or home video or on television, and to produce, distribute, and otherwise exploit as a television program, movie of the week, television series or a television spinoff any audiovisual work based on the Picture, its story line, or any one or more of its characters.

8. “Derivative Rights Agreements” means, collectively: (i) the Co-Ownership Agreements between Village and Warner Bros. setting forth the parties’ mutual agreement and understanding concerning the ownership and exploitation of the Derivative Rights in the Pictures; (ii) that certain *Omnibus Amendment to Co-Ownership Agreements* dated as of August 29, 2017; and (iii) that certain *Omnibus Amendment No. 2* dated as of November 10, 2020.

9. “Documents” includes data stored electronically in any form or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term. For the avoidance of doubt, “Documents” is used in the broadest sense and also includes, but is not limited to, emails, text messages, audio recordings, and all forms of social media messaging or posting, including but not limited to Facebook, Twitter/X, Instagram, TikTok, WhatsApp, and LinkedIn.

10. “Person” and “entity” mean individuals and entities, including but not limited to all natural persons, businesses, firms, partnerships, associates, organizations, governmental units, joint ventures, corporations, and any other entities.

11. “Pictures” means, collectively, the 91 theatrical motion pictures co-financed by Village and Warner Bros., beginning with the 1998 film *Practical Magic*.

12. “Project Notice” has the meaning ascribed to it in the Derivative Rights Agreements.

13. “Project Notice Acceptance” has the meaning ascribed to it in the Derivative Rights Agreements.

14. “Projected Budget” has the meaning ascribed to it in the Derivative Rights Agreements.

15. “Relate to” or “relating to” means discussing, describing, referring to, reflecting, containing, embodying, analyzing, studying, reporting on, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning or pertaining to, in whole or in part.

16. “Sequel or Remake Project” has the meaning ascribed to it in the Derivative Rights Agreements.

17. All phrases following the terms “including,” “including but not limited to,” and “including without limitation” are intended to illustrate the kind of documents or communications relevant to each topic. These examples are not intended to be exhaustive of the information sought and shall not in any way be read to limit the scope of the topics.

18. “And” and “or” are terms of inclusion and not of exclusion, and should be construed either disjunctively or conjunctively as necessary to bring within the scope of these topics any information that might otherwise be construed to be outside their scope.

19. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form as necessary to bring within the scope of these topics that might otherwise be construed to be outside their scope.

### **TOPICS FOR EXAMINATION**

1. Warner Bros.’ ownership and exploitation of the Derivative Rights over the course of the Parties’ relationship.

2. The terms and underlying facts related to the contractual agreements between Village and Warner Bros. over the course of the Parties’ relationship, including but not limited to the Derivative Rights Agreements.

3. Warner Bros.’ historical and contractual relationship with the Debtors, including but not limited to the Parties’ course of dealing throughout the course of the Parties’ relationship.

4. The circumstances and underlying facts supporting the allegations contained in Warner Bros.’ Objection [*Docket No. 518*].

5. Warner Bros.’ performance of its obligations under the Derivative Rights Agreements.

6. The negotiation, formation, and execution of the Derivative Rights Agreements.

7. Warner Bros.’ responses to the Debtors’ First Sets of Requests for Production, Interrogatories, and Requests for Admission.

8. The authenticity of Warner Bros.’ documents produced in this Action.



9. Warner Bros.' search for, collection, and production of Documents in response to the Debtors' First Set of Requests for Production.

10. Warner Bros.' organizational structure, including organizational charts and directories, that identify the Persons and Entities involved with the allegations in Warner Bros.' Objection.

11. The identities and roles of all Persons associated with Warner Bros. who participated in the Auction.

12. The underlying Arbitration proceedings between Warner Bros. and the Debtors, including the claims and defenses asserted therein.

13. All facts and circumstances surrounding Warner Bros.' preparations for, participation in, and conduct at the auction held by the Debtors on May 28, 2025, pursuant to the Bid Procedures Order.

14. Warner Bros.' contractual and business relationship with Alcon.