

**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)

**AMENDED NOTICE OF DEPOSITION OF REGENCY ENTERTAINMENT
(USA), INC. PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Rules 7030 and 9014 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* (Dkt. No. 518), Alcon Media Group, LLC ("Propounding Party"), by and through its undersigned counsel, will take the deposition of the person(s) designated by Regency Entertainment (USA), Inc. ("Responding Party") to testify on its behalf about each of the topics of examination (collectively, the "Topics") as set forth in **Attachment A**. The deposition will take place via videoconference and shall commence on **October 1, 2025, at 12:30 p.m. P.T.**

PLEASE TAKE FURTHER NOTICE THAT the above referenced deposition will be taken before a court reporter who is authorized to administer oaths and will continue day to day, excluding Sundays and holidays, until completed.

PLEASE TAKE FURTHER NOTICE that said reporter will record the testimony by stenographic means and may utilize instant visual display of the testimony of deponent. Notice of the possible use of instant visual display of the testimony is being provided pursuant to Federal Rule of Civil Procedure 30.

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>.



251047525093000000000002

PLEASE TAKE FURTHER NOTICE that, under Federal Rule of Civil Procedure 30, the deposition may be recorded by videotape, and that, under Federal Rule of Civil Procedure 30, the videotape record of this deposition may be used at any hearing or trial.

PLEASE TAKE FURTHER NOTICE, in accordance with the applicable rules, that Responding Party shall designate one or more officers, directors, managing agents or other persons who consent to testify on its behalf as to each of the topics set forth in **Attachment A** attached hereto. Responding Party is requested to provide Propounding Party with the identity of the individual(s) who will testify regarding each topic at least three business days in advance of the deposition.

Dated: September 30, 2025

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown

Kimberly A. Brown (No. 5138)
George A. Williams III (No. 6964)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
Email: brown@lrclaw.com
williams@lrclaw.com

and

Daniel S. Miller (Admitted *pro hac vice*)
Colin H. Rolfs (Admitted *pro hac vice*)
2121 Avenue of the Stars, Suite 2600
Los Angeles, California 90067
Telephone: (310) 552-4400
Facsimile: (310) 552-8400
Email: dmiller@millerbarondess.com
crolfs@millerbarondess.com

Attorneys for Alcon Media Group, LLC

ATTACHMENT A

DEFINITIONS

1. “Regency,” “You,” or “your” refer to Regency Entertainment (USA), 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 above-captioned debtors and debtors in possession (the “Debtors”).

3. “Alcon” refers to Alcon Media Group, LLC and its affiliates, and any of their respective representatives.

4. The “Objection” refers to the *Objection by Regency Entertainment (USA), Inc. to Sale of Debtors’ Assets* (Dkt. No. 481).

5. “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.

6. 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 OF EXAMINATION

TOPIC NO. 1:

The factual basis for Your contention that the “*Don’t Say a Word*” *Co-Ownership Agreement* is a personal services contract, as asserted in Your Objection.

TOPIC NO. 2:

The individuals at Village whose “personal character and skills” You relied on in entering into the “*Don’t Say a Word*” *Co-Ownership Agreement* with Village, as asserted in Your Objection, and Your relationship with such individuals.

TOPIC NO. 3:

The factual basis of any objection You assert to the sale of Derivative Rights in “*Don’t Say a Word*” by Village to Alcon.

TOPIC NO. 4:

The factual basis for Your responses to Alcon’s First Set of Interrogatories.

CERTIFICATE OF SERVICE

The undersigned certifies that, on September 30, 2025, a copy of the foregoing document was served by email on counsel for Regency Entertainment (USA), Inc.:

Gregory W. Hauswirth
Carothers & Hauswirth, LLP
1007 N. Orange Street, 4th Floor
Wilmington, DE 19801
Email: ghauswirth@ch-legal.com

Sandford L. Frey
**Leech Tishman Nelson
Hardiman, Inc.**
1100 Glendon Avenue, 14th Floor
Los Angeles, CA 90024
Email: sfrey@leechtishman.com

John M. Steiner
Michael Kruszewski
Kristin Anders Lawson
Leech Tishman Fuscaldo & Lampl, LLC
525 William Penn Place, 28th Floor
Pittsburgh, PA 15219
Email: jsteiner@leechtishman.com
mkruszewski@leechtishman.com
klawson@leechtishman.com

By: /s/ Kimberly A. Brown
Kimberly A. Brown