

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

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In re:

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

Debtors.

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

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**SECOND SUPPLEMENTAL DECLARATION OF  
CHAD J. HUSNICK IN SUPPORT OF THE DEBTORS’  
APPLICATION FOR ENTRY OF AN ORDER PURSUANT TO  
SECTION 327(e) OF THE BANKRUPTCY CODE AUTHORIZING THE  
RETENTION AND EMPLOYMENT OF KIRKLAND & ELLIS LLP AND  
KIRKLAND & ELLIS INTERNATIONAL LLP AS SPECIAL LITIGATION  
COUNSEL FOR THE DEBTORS EFFECTIVE AS OF MARCH 17, 2025**

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I, Chad J. Husnick, being duly sworn, state the following under penalty of perjury:

1. I am the president of Chad J. Husnick, P.C., a partner of the law firm of Kirkland & Ellis LLP, located at 333 West Wolf Point Plaza, Chicago, IL 60654, and a partner of Kirkland & Ellis International, LLP (together with Kirkland & Ellis LLP, collectively, “Kirkland”). I am a member in good standing of the Bar of the State of Illinois and the Bar of the State of New York, and I have been admitted to practice in the Supreme Court of the United States, the United States Courts of Appeals for the Second Circuit, Fourth Circuit, and Seventh Circuit, and the United States District Courts for the Northern District of Illinois and the Southern District of New York. There are no disciplinary proceedings pending against me.

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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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2. On March 17, 2025, (the “Petition Date”), each of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed a petition with this Court under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). On April 10, 2025, the Debtors filed an application to employ and retain Kirkland as counsel for the Debtors [Docket No. 174] (the “Application”) pursuant to sections 327(e) and 330 of the Bankruptcy Code, rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 2014-1 and 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

3. My declaration in support of the Application (the “Original Declaration”) was attached to the Application as Exhibit B. On April 28, 2025, the Court entered the *Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Special Litigation Counsel for the Debtors Effective as of March 17, 2025* [Docket No. 290] (the “Retention Order”).

4. On July 29, 2025, the Debtors filed the *Supplemental Declaration of Chad J. Husnick in Support of the Debtors’ Application for Entry of an Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Special Litigation Counsel for the Debtors Effective as of March 17, 2025* [Docket No. 701] (the “First Supplemental Declaration” and together with the Original Declaration, the “Prior Declarations”). In connection with the Application and the Retention Order, I submit this second supplemental declaration (this “Second Supplemental Declaration”) to provide additional disclosures in accordance with Bankruptcy Rules 2014(a)

and 2016(b). Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein.

5. In the Original Declaration, I disclosed Kirkland's billing rates in effect at that time for matters related to these chapter 11 cases. I also disclosed that the billing rates are subject to periodic adjustments to reflect economic and other conditions. Pursuant to the Retention Order, Kirkland must provide notice of changes to its billing rates during these chapter 11 cases.

6. In accordance with ordinary practice, some billing rates for partners and associates will change effective as of January 1, 2026. The rates will change due to rate increases or promotion, although Kirkland does not typically disclose changes to billing rates resulting from promotion. Kirkland's billing rates that will take effect on January 1, 2026, for matters related to these chapter 11 cases range as follows:<sup>2</sup>

<u>Billing Category</u>	<u>Range</u>
Partners	\$1,395-\$2,975
Of Counsel	\$875 - \$2,495
Associates	\$825 - \$1,775
Paraprofessionals	\$385 - \$775

#### **Additional Disclosures**

7. As set forth in the Prior Declarations, Kirkland has searched its electronic database of representations for connections to parties in interest in these chapter 11 cases. Certain connections were disclosed in the Prior Declarations. Since the Original Declaration was

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<sup>2</sup> For professionals and paraprofessionals residing outside of the U.S., hourly rates are billed in the applicable currency. When billing a U.S. entity, such foreign rates are converted into U.S. dollars at the then applicable conversion rate. After converting these foreign rates into U.S. dollars, it is possible that certain rates may exceed the billing rates listed in the chart. In addition, the rate ranges may change if an individual leaves or joins Kirkland. In either case, Kirkland does not intend to update the ranges for such circumstances.

filed Kirkland has not become aware of any additional parties in interest in these chapter 11 cases.

8. Kirkland re-ran searches in its electronic database for the entities that were previously reviewed in the Prior Applications. Listed in **Schedule 1** to this Second Supplemental Declaration are new client connections for entities identified in the Original Declaration.<sup>3</sup> None of the current and prior representations of the parties identified on **Schedule 1** are materially adverse to the interests of the Debtors' estates on matters in which Kirkland is representing the Debtors.

9. Based on the conflicts searches conducted to date, to the best of my knowledge, neither, I, Kirkland, nor any partner, of counsel, or associate thereof, insofar as I have been able to ascertain, has any connections with the Debtors or any party in interest in these chapter 11 cases except as disclosed or otherwise described in this Second Supplemental Declaration and in the Prior Declarations.

10. Generally, it is Kirkland's policy to disclose entities in the capacity that they first appear in the conflicts search. For example, if an entity has already been disclosed in the Prior Declarations in one capacity (*e.g.*, a customer), and the entity appears in the subsequent conflicts search in a different capacity (*e.g.*, a vendor), Kirkland does not disclose the same entity again in

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<sup>3</sup> As referenced in **Schedule 1**, the term "current client" means an entity listed as a client in Kirkland's conflicts search system to whom time was posted in the 12 months preceding the Petition Date. As referenced in **Schedule 1**, the term "former client" means an entity listed as a client in Kirkland's conflicts search system to whom time was posted between 12 and 36 months preceding the Petition Date. As referenced in **Schedule 1**, the term "closed client" means an entity listed as a client in Kirkland's conflicts search system to whom time was posted in the 36 months preceding the Petition Date, but for which the client representation has been closed. Whether an actual client relationship exists can only be determined by reference to the documents governing Kirkland's representation rather than its potential listing in Kirkland's conflicts search system. The list generated from Kirkland's conflicts search system is over-inclusive. As a general matter, Kirkland discloses connections with "former clients" or "closed clients" for whom time was posted in the last 36 months but does not disclose connections if time was billed more than 36 months before the Petition Date.

supplemental declarations, unless the circumstances are such in the latter capacity that additional disclosure is required

11. Kirkland will continue to review its files periodically during the pendency of these chapter 11 cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, Kirkland will use reasonable efforts to identify such further developments and will promptly file an additional supplemental declaration, as required by Bankruptcy Rule 2014(a).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: December 11, 2025

Respectfully submitted,

/s/ Chad J. Husnick

Chad J. Husnick  
as President of Chad J. Husnick, P.C., as Partner of  
Kirkland & Ellis LLP; and as Partner of Kirkland &  
Ellis International LLP

## **SCHEDULE 1**

**SCHEDULE 1**

<b>Name of Entity Searched</b>	<b>Name of Entity and/or Affiliate of Entity, that is a K&amp;E Client</b>	<b>Status</b>
City National Bank	RBC Global Asset Management (UK) Ltd.	Current
Excel	Sodexo U.S.	Current
Falcon Strategic Partners IV LP	Onex Partners V	Current
GoDaddy Operating Co. LLC	GoDaddy Inc.	Current
JPMorgan Chase Bank NA	JPMorgan	Current
Paramount Pictures Corp.	Paramount Global Paramount Skydance Corp. Paramount Streaming Services Inc.	Current Current Current
Paul Hastings LLP	Paul Hastings LLP	Current
United States, Government of the, Internal Revenue Service	United States Postal Service	Current
United Talent Agency LLC	Exeter Europe Investment Partnership S.C.Sp	Current