

**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)

Ref. Nos. 1122 and 1152

**AMENDED CERTIFICATE OF NO OBJECTION**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to *Alcon Media Group, LLC's Motion to File Under Seal Alcon Media Group, LLC's (I) Joinder to the Debtors' Objection to Warner Bros.' Motion for a Stay of the Derivative Rights Sale Order Pending Appeal and (II) Objection to Warner Bros.' Motion for Stay Pending Appeal* [D.I.1122] (the "Motion") filed on November 26, 2025. The undersigned further certifies that he has reviewed the Court's docket in these cases and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the notice, responses, if any, to the relief requested in the Motion were to be filed and served on or before December 11, 2025, at 4:00 p.m. (ET).

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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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As no responses to the Motion have been received, it is hereby respectfully requested that the proposed order, attached to the Motion and attached hereto as **Exhibit A**, be entered at the Court's earliest convenience.

Dated: December 17, 2025  
Wilmington, Delaware

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**EXHIBIT A**

**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)

Ref. No. 1122

**ORDER AUTHORIZING THE FILING UNDER SEAL OF ALCON MEDIA GROUP,  
LLC’S (I) JOINDER TO THE DEBTORS’ OBJECTION TO WARNER BROS.’  
MOTION FOR A STAY OF THE DERIVATIVE RIGHTS SALE ORDER PENDING  
APPEAL AND (II) OBJECTION TO WARNER BROS.’ MOTION  
FOR STAY PENDING APPEAL**

Upon the motion (the “Motion”)<sup>2</sup> of Alcon Media Group, LLC (“Alcon”) for entry of an order (this “Order”), pursuant to Bankruptcy Code section 107(b), Bankruptcy Rule 9018, Local Rule 9018-1, and the Protective Order, authorizing Alcon to file under seal Confidential Information contained in the Objection, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and this Court having determined that it may enter a final order

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

consistent with Article III of the United States Constitution; and this Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. Alcon is authorized to file the Confidential Information under seal and to redact such Confidential Information in the Objection pursuant to Bankruptcy Code section 107(b), Bankruptcy Rule 9018, Local Rule 9018-1, and the Protective Order.
3. The Confidential Information is confidential and shall remain under seal, and shall not be made available to anyone, except that an unredacted copy of the Objection shall be provided to: (a) the Court, (b) the Clerk of the Court, (c) the United States Trustee for the District of Delaware, (d) counsel to the Debtors, (e) counsel to the Official Committee of Unsecured Creditors, (f) counsel to Warner Bros., and (g) such other parties as ordered by this Court or as agreed to in writing by the parties, which parties shall keep the Confidential Information strictly confidential.
4. Any party who receives the unredacted Objection in accordance with this Order shall not disclose or otherwise disseminate such unredacted Objection, or the information contained therein, to any other person or entity.
5. Alcon is authorized to take all actions necessary and appropriate to carry out the relief granted in this Order.
6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.