IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
VILLAGE ROADSHOW ENTERTAINMENT GROUP USA INC., *et al.*,[1]	Case No. 25-10475 (TMH)
	(Jointly Administered)
Debtors.	**Hearing Date: August 7, 2026, at 11:00 a.m. (ET)** **Obj. Deadline: July 28, 2026 at 4:00 p.m. (ET)**

LIQUIDATION TRUSTEE'S MOTION FOR AN ORDER EXTENDING THE CLAIMS OBJECTION BAR DATE UNDER THE CONFIRMED CHAPTER 11 PLAN

Kevin Berg, solely in his capacity as the liquidation trustee (the "Liquidation Trustee") under the *Joint Chapter 11 Plan of Village Roadshow Entertainment Group USA Inc. and Its Debtor Affiliates* [Docket No. 1516] (the "Plan"),[2] hereby submits this motion (this "Motion") for entry of an order (the "Proposed Order"), extending the Claims Objection Bar Date (defined below) established by the order [Docket No. 1565] (the "Confirmation Order") confirming the Plan by approximately 100 days, through and including November 9, 2026. In support of this Motion, the Liquidation Trustee respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has 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

[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.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

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February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The legal bases for the relief requested in this Motion are section 105(a) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

BACKGROUND

I. General Background

4. On March 17, 2025 (the "Petition Date"), the above-captioned debtor and certain of its affiliates (collectively, the "Debtors") each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On March 27, 2025, the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Committee") [Docket No. 103]. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases.

5. On April 17, 2026, the Court entered the Confirmation Order confirming the Plan [Docket No. 1565]. On May 1, 2026, the Plan went effective (the "Effective Date"). Prior to the Effective Date, the Debtors filed two omnibus claims objections, which the Court sustained. *See* Docket Nos. 1265, 1326 & 1689.

II. The Claims Objection Bar Date and the Status of the Claims Reconciliation Process

6. Pursuant to the Plan, the Liquidation Trustee has the right to make and file objections to, or otherwise contest, the allowance of Claims. The deadline by which objections to Claims are required to be filed and served (the "Claims Objection Bar Date") is ninety (90) days after the Effective Date. Plan Art. I.A. Accordingly, the Claims Objection Bar Date is July 30, 2026 (the "Current Deadline").

7. To date, approximately 98 proofs of claim[3] have been asserted in the Debtors' chapter 11 cases. Both prior to and after the Effective Date, the Debtor and the Liquidation Trustee (as applicable), and their professionals, reviewed and worked to reconcile the filed proofs of claim with the Debtor's books and records to determine the validity of the asserted claims. This reconciliation process includes identifying categories of claims that may be targeted for modification, disallowance, or expungement. To date, the Debtors have filed two (2) omnibus objections to claims [Docket Nos. 1167 & 1608]. Additionally, the Debtors and the Liquidation Trustee (as applicable) have reached consensual resolutions of claims with certain creditors. Except for the Guild Claims (as defined in the Confirmation Order), the Liquidation Trustee believes the claims reconciliation process is substantially complete. However, because the reconciliation of the Guild Claims are ongoing, the Liquidation Trustee requires an extension of the Current Deadline.

RELIEF REQUESTED

8. By this Motion, the Liquidation Trustee requests that the Court enter the Proposed Order extending Current Deadline by approximately 100 days, through and including November

[3] This total includes certain master proofs of claim, which detail multiple claims in one filing.

9, 2026, without prejudice to the rights of the Liquidation Trustee to seek further extensions of the Claims Objection Bar Date.[4]

BASIS FOR RELIEF

9. Section 105(a) of the Bankruptcy Code provides that "the court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a).

10. Bankruptcy Rule 9006(b) provides that the court may extend unexpired time periods, such as the Claims Objection Bar Date, without notice:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order.

Fed. R. Bankr. P. 9006(b)(1).

11. The Liquidation Trustee submits that cause exists to grant the extension sought herein. The Debtors commenced the claims reconciliation process prior to confirmation of the Plan. *See* Docket Nos. 1265, 1326 & 1689. Since the Effective Date, the Liquidation Trustee has continued the process of evaluating and addressing the claims filed in the Debtors' cases. To date, the Debtors and the Liquidation Trustee have made significant progress with respect to the claims reconciliation and review process by filing omnibus objections to claims and consensually resolving several other claims. However, the deadline for holders of the Guild Claims to finalize their claims is August 31, 2026, which hinders the Liquidation Trustee's ability to proactively

[4] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the Current Deadline shall automatically extend the Current Deadline until the Court acts on this Motion—without the necessity for entry of a bridge order.

reconcile these claims. This deadline is subject to further extensions, which could further delay the Liquidation Trustee's review of the Guild Claims.

12. While significant progress has been made to date, the Liquidation Trustee needs additional time to properly and carefully evaluate the Claims filed in the Debtors' chapter 11 cases and finalize the reconciliation of the Guild Claims. Therefore, the Liquidation Trustee submits that extending the Claims Objection Bar Date is necessary and appropriate to ensure that the claims reconciliation process, including the prosecution of any objections to Claims, is accurate, comprehensive, and completed in a timely and efficient manner.

13. For the reasons set forth above, the Liquidation Trustee submits that extending the Current Deadline through and including November 9, 2026, is necessary, prudent and in the best interests of the Debtors, their estates and creditors.

NOTICE

14. The Liquidation Trustee will provide notice of this Motion to: (a) the U.S. Trustee; and (b) any party that requests service pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, no other or further notice need be given.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, the Liquidation Trustee respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein, and granting such other relief as is just and proper.

Dated: July 14, 2026
Wilmington, Delaware

/s/ Brynna M. Gaffney

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Co-Counsel for the Liquidation Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
VILLAGE ROADSHOW ENTERTAINMENT GROUP USA INC., *et al.*,[1]	)	Case No. 25-10475 (TMH)
	)	(Jointly Administered)
Debtors.	)	**Hearing Date: August 7, 2026, at 11:00 a.m. (ET)** **Obj. Deadline: July 28, 2026, at 4:00 p.m. (ET)**

NOTICE OF FILING OF MOTION

PLEASE TAKE NOTICE that on the date hereof, Kevin Berg, solely in his capacity as the liquidation trustee (the "Liquidation Trustee") filed the *Liquidation Trustee's Motion For an Order Extending the Claims Objection Bar Date Under the Confirmed Chapter 11 Plan* (the "Motion").[2]

PLEASE TAKE FURTHER NOTICE that that any objections to the Motion must be filed on or before **July 28, 2026 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection upon the undersigned counsel to the Liquidation Trustee so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and other information regarding these chapter 11 cases are available for inspection free of charge on the case website at https://www.veritaglobal.net/vreg.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON **AUGUST 7, 2026, AT 11:00 A.M. (ET)** BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY COURT JUDGE

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[2] Capitalized terms used but not defined herein shall have the meanings given in the Motion.

FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: July 14, 2026
Wilmington, Delaware

/s/ Brynna M. Gaffney

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EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
VILLAGE ROADSHOW ENTERTAINMENT GROUP USA INC., *et al.*,[1]	)	Case No. 25-10475 (TMH)
	)	(Jointly Administered)
Debtors.	)	**Ref. Docket No. ___**

ORDER EXTENDING THE CLAIMS OBJECTION BAR DATE
UNDER CONFIRMED CHAPTER 11 PLAN

Upon consideration of the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order"), extending the Claims Objection Bar Date under the Plan through and including November 9, 2026, 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 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 this Court may enter a final order consistent with Article III of the United States Constitution; 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 this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in

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interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"), if any; and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.

2. The Claims Objection Bar Date is hereby through and including November 9, 2026.

3. This Order shall be without prejudice to the rights of the Liquidation Trustee to seek further extensions of the Claims Objection Bar Date.

4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.