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 Nos. 1789 & 1793**

CERTIFICATION OF COUNSEL REGARDING ORDER (I) DENYING MOTION FOR PRESERVATION OF DEBTOR BOOKS AND RECORDS; AND (II) DENYING SANCTIONS MOTION

On August 26, 2026, Mr. John. T. Pautsch filed the *Motion of John T. Pautsch for Preservation of Debtor Books and Records Under Paragraph 114 of the Confirmation Order (D.I. 1565)* [Docket No. 1789] (the "Motion to Preserve"). In response, on September 21, 2026, the Liquidation Trustee filed the (I) *Objection to the Motion of John T. Pautsch for Preservation of Debtor Books and Records Under Paragraph 114 of the Confirmation Order*; and (II) *Motion for Non-Monetary Sanctions Including a Pre-Filing Injunction* [Docket No. 1793] (the "Sanctions Motion")[2] with the United States Bankruptcy Court for the District of Delaware (the "Court"). A hearing before the Court was scheduled on October 13, 2026 at 2:00 p.m. (ET) (the "Hearing").

[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 Objection and Sanctions Motion.

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At the Hearing, the Court denied the Motion to Preserve and the Sanctions Motion. Accordingly, the Liquidation Trustee hereby submits an order (the "Proposed Order"), attached hereto as **Exhibit A**, denying the Motion to Preserve and the Sanctions Motion. The Liquidation Trustee has shared the Proposed Order with Mr. John T. Pautsch, who does not object to the Proposed Order.

WHEREFORE, the Liquidation Trustee respectfully requests that the Proposed Order be entered at the earliest convenience of the Court.

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Dated: October 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 Nos. 1789 & 1793**

ORDER (I) DENYING MOTION FOR PRESERVATION OF DEBTOR BOOKS AND RECORDS; AND (II) DENYING SANCTIONS MOTION

Upon consideration of the (I) *Objection to the Motion of John T. Pautsch for Preservation of Debtor Books and Records Under Paragraph 114 of the Confirmation Order*; and (II) *Motion for Non-Monetary Sanctions Including a Pre-Filing Injunction* [Docket No. 1793] (the "Objection and Sanctions Motion"), filed by the Liquidation Trustee;[2] and the *Motion of John T. Pautsch for Preservation of Debtor Books and Records Under Paragraph 114 of the Confirmation Order (D.I. 1565)* [Docket No. 1789] (the "Motion to Preserve"), filed by Mr. John T. Pautsch; and this Court having jurisdiction to consider the Objection and Sanctions Motion, the Motion to Preserve, and all other related filings 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 venue being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter constituting a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having authority to enter a final

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

order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion to Preserve and the Objection and Sanctions Motion having been provided under the circumstances; and the Court having considered the submissions of the parties and the statements presented at the hearing on October 13, 2026 (the "Hearing"); and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion to Preserve is **DENIED** as set forth on the record at the Hearing.

2. The Sanctions Motion is **DENIED** as set forth on the record at the Hearing.

3. This Court retains jurisdiction to interpret, implement, and enforce this Order.