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: December 17, 2026 at 11:00 a.m. (ET)** **Obj. Deadline: November 23, 2026 at 4:00 p.m. (ET)**

LIQUIDATION TRUSTEE'S MOTION FOR AN ORDER FURTHER 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"), further extending the Claims Objection Bar Date (defined below) established by the order confirming the Plan [Docket No. 1565] (the "Confirmation Order") by one hundred twenty (120) days, through and including March 9, 2027. 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*

[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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Order of Reference from the United States District Court for the District of Delaware, dated 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 initial deadline by which objections to Claims were required to be filed and served (the "Claims Objection Bar Date") was ninety (90) days after the Effective Date. Plan Art. I.A. Accordingly, the initial Claims Objection Bar Date was July 30, 2026.

7. Upon the motion of the Liquidation Trustee [Docket No. 1734], and by order of the Court [Docket No. 1784], the Claims Objection Bar Date has previously been extended through and including November 9, 2026 (the "Current Deadline"). The Liquidation Trustee submits that it is in the best interest of the Debtors' estates that the Claims Objection Bar Date be further extended.

8. 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 Debtors and the Liquidation Trustee (as applicable), and their professionals, reviewed and worked to reconcile the filed proofs of claim with the Debtors' 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.

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

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 is still ongoing, the Liquidation Trustee requires a further extension of the Current Deadline.

RELIEF REQUESTED

9. By this Motion, the Liquidation Trustee requests that the Court enter the Proposed Order extending the Current Deadline by one hundred twenty (120) days, through and including March 9, 2027, without prejudice to the rights of the Liquidation Trustee to seek further extensions of the Claims Objection Bar Date.[4]

BASIS FOR RELIEF

10. Section 105(a) of the Bankruptcy Code provides that "[t]he 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).

11. Bankruptcy Rule 9006(b) provides that the court may extend unexpired time periods, such as the Claims Objection Bar Date, without notice when a rule or order "requires or allows an act to be performed at or within a specified period" and "a request to extend is made before the period (or a previously extended period) expires[.]" Fed. R. Bankr. P. 9006(b)(1).

12. 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,

[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.

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.

13. 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 further 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.

14. For the reasons set forth above, the Liquidation Trustee submits that further extending the Current Deadline through and including March 9, 2027, is necessary, prudent and in the best interests of the Debtors, their estates and creditors.

NOTICE

15. 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 requests 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: November 9, 2026
Wilmington, Delaware

/s/ Brynna M. Gaffney

YOUNG CONAWAY STARGATT & TAYLOR, LLP
Joseph M. Mulvihill (Del. Bar No. 6061)
Brynna M. Gaffney (Del. Bar No. 7402)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: jmulvihill@ycst.com
bgaffney@ycst.com

Co-Counsel for the Liquidation Trustee

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
Justin R. Bernbrock (admitted *pro hac vice*)
Matthew T. Benz (admitted *pro hac vice*)
321 North Clark Street, 32nd Floor
Chicago, IL 60654
Telephone: (312) 499-6300
Facsimile: (312) 499-6301
Email: jbernbrock@sheppardmullin.com
mbenz@sheppardmullin.com

-and-

Jennifer L. Nassiri (admitted *pro hac vice*)
1901 Avenue of the Stars, Suite 1600
Los Angeles, CA 90067
Telephone: (310) 228-3700
Facsimile: (310) 228-3701
Email: jnassiri@sheppardmullin.com

-and-

Alyssa Paddock (admitted *pro hac vice*)
30 Rockefeller Plaza, 39th Floor
New York, NY 10112
Telephone: (212) 653-8700
Facsimile: (212) 653-8701
Email: apaddock@sheppardmullin.com

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: December 17, 2026 at 11:00 a.m. (ET)** **Obj. Deadline: November 23, 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 Further Extending the Claims Objection Bar Date Under the Confirmed Chapter 11 Plan* (the "Motion").

PLEASE TAKE FURTHER NOTICE that that any objections to the Motion must be filed on or before **November 23, 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 **DECEMBER 17, 2026, AT 11:00 A.M. (ET)** BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY COURT JUDGE FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

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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: November 9, 2026
Wilmington, Delaware

/s/ Brynna M. Gaffney

YOUNG CONAWAY STARGATT & TAYLOR, LLP
Joseph M. Mulvihill (Del. Bar No. 6061)
Brynna M. Gaffney (Del. Bar No. 7402)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: jmulvihill@ycst.com
bgaffney@ycst.com

Co-Counsel for the Liquidation Trustee

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
Justin R. Bernbrock (admitted *pro hac vice*)
Matthew T. Benz (admitted *pro hac vice*)
321 North Clark Street, 32nd Floor
Chicago, IL 60654
Telephone: (312) 499-6300
Facsimile: (312) 499-6301
Email: jbernbrock@sheppardmullin.com
mbenz@sheppardmullin.com

-and-

Jennifer L. Nassiri (admitted *pro hac vice*)
1901 Avenue of the Stars, Suite 1600
Los Angeles, CA 90067
Telephone: (310) 228-3700
Facsimile: (310) 228-3701
Email: jnassiri@sheppardmullin.com

-and-

Alyssa Paddock (admitted *pro hac vice*)
30 Rockefeller Plaza, 39th Floor
New York, NY 10112
Telephone: (212) 653-8700
Facsimile: (212) 653-8701
Email: apaddock@sheppardmullin.com

Co-Counsel for the Liquidation Trustee

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 FURTHER EXTENDING THE CLAIMS OBJECTION BAR DATE UNDER THE 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"), further extending the Claims Objection Bar Date under the Plan through and including March 9, 2027, 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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[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

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 March 9, 2027.

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.