

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

RELATIVITY FASHION, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 15-11989 (MEW)

(Jointly Administered)

**NOTICE OF (I) DEADLINE FOR CASTING VOTES TO ACCEPT OR REJECT PLAN OF
REORGANIZATION, (II) HEARING TO CONSIDER CONFIRMATION OF PLAN OF
REORGANIZATION AND (III) RELATED MATTERS**

PLEASE TAKE NOTICE:

1. On July 30, 2015, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) commenced these cases by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

2. Copies of the Disclosure Statement Order, including the Plan and the Disclosure Statement, are available at the Debtors’ expense upon request to Donlin, Recano & Company, Inc., re: Relativity Fashion, LLC, et al., Attn: Ballot Processing, P. O. Box 2034, Murray Hill Station, New York, NY 10156-0701. In addition, any party may review the Disclosure Statement Order, the Bidding Procedures Order, including the Bidding Procedures, the Plan and the Disclosure Statement and related exhibits without charge via the internet at <https://www.donlinrecano.com/Clients/rm/PlanOfReorg>. On November 18, 2015, the Debtors filed: (a) *Plan Proponents’ Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* (Dkt. No. 992) (as it may be amended or modified, the “**Plan**”)² and (b) *Disclosure Statement for Plan Proponents’ Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* (Dkt. No. 991), which was revised on November 20, 2015 (as it may be further amended or modified, the “**Disclosure Statement**”).

3. A hearing to consider confirmation of the Plan (the “**Confirmation Hearing**”), will be held before the Honorable Michael E. Wiles, United States Bankruptcy Judge, in Courtroom 617 at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004 beginning at 10:00 a. m. (Prevailing Eastern Time) on February 1, 2016.

4. Pursuant to the orders of the Bankruptcy Court dated December 17, 2015 (Dkt. No. 1140 and 1141) (the “**Disclosure Statement Order**” and the “**Solicitation Procedures Order**” respectively), the Disclosure Statement and certain related materials (collectively, the “**Solicitation Materials**”) have been approved for solicitation of votes to accept or reject the Plan.

5. Pursuant to the Plan, Classes B, C, D, E, G and J are entitled to vote on the Plan.

¹ The Debtors in these chapter 11 cases are set forth on page (i).

² Capitalized terms not otherwise defined herein have the meanings given to them in the Plan.

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Relativity Fashion, LLC (4571); Relativity Holdings LLC (7052); Relativity Media, LLC (0844); Relativity REAL, LLC (1653); RML Distribution Domestic, LLC (6528); RML Distribution International, LLC (6749); RMLDD Financing, LLC (9114); 21 & Over Productions, LLC (7796); 3 Days to Kill Productions, LLC (5747); A Perfect Getaway P.R., LLC (9252); A Perfect Getaway, LLC (3939); Armored Car Productions, LLC (2750); Best of Me Productions, LLC (1490); Black Or White Films, LLC (6718); Blackbird Productions, LLC (8037); Brant Point Productions, LLC (9994); Brick Mansions Acquisitions, LLC (3910); Brilliant Films, LLC (0448); Brothers Productions, LLC (9930); Brothers Servicing, LLC (5849); Catfish Productions, LLC (7728); Cine Productions, LLC (8359); CinePost, LLC (8440); Cisco Beach Media, LLC (8621); Cliff Road Media, LLC (7065); Den of Thieves Films, LLC (3046); Don Jon Acquisitions, LLC (7951); DR Productions, LLC (7803); Einstein Rentals, LLC (5861); English Breakfast Media, LLC (2240); Furnace Films, LLC (3558); Gotti Acquisitions, LLC (6562); Great Point Productions, LLC (5813); Guido Contini Films, LLC (1031); Hooper Farm Music, LLC (3773); Hooper Farm Publishing, LLC (3762); Hummock Pond Properties, LLC (9862); Hunter Killer La Productions, LLC (1939); Hunter Killer Productions, LLC (3130); In The Hat Productions, LLC (3140); J&J Project, LLC (1832); JGAG Acquisitions, LLC (9221); Left Behind Acquisitions, LLC (1367); Long Pond Media, LLC (7197); Madaket Publishing, LLC (9356); Madaket Road Music, LLC (9352); Madvine RM, LLC (0646); Malavita Productions, LLC (8636); MB Productions, LLC (4477); Merchant of Shanghai Productions, LLC (7002); Miacomet Media LLC (7371); Miracle Shot Productions, LLC (0015); Most Wonderful Time Productions, LLC (0426); Movie Productions, LLC (9860); One Life Acquisitions, LLC (9061); Orange Street Media, LLC (3089); Out Of This World Productions, LLC (2322); Paranoia Acquisitions, LLC (8747); Phantom Acquisitions, LLC (6381); Pocomo Productions, LLC (1069); Relative Motion Music, LLC (8016); Relative Velocity Music, LLC (7169); Relativity Development, LLC (5296); Relativity Film Finance II, LLC (9082); Relativity Film Finance III, LLC (8893); Relativity Film Finance, LLC (2127); Relativity Films, LLC (5464); Relativity Foreign, LLC (8993); Relativity India Holdings, LLC (8921); Relativity Jackson, LLC (6116); Relativity Media Distribution, LLC (0264); Relativity Media Films, LLC (1574); Relativity Music Group, LLC (9540); Relativity Production LLC (7891); Relativity Rogue, LLC (3333); Relativity Senator, LLC (9044); Relativity Sky Land Asia Holdings, LLC (9582); Relativity TV, LLC (0227); Reveler Productions, LLC (2191); RML Acquisitions I, LLC (9406); RML Acquisitions II, LLC (9810); RML Acquisitions III, LLC (9116); RML Acquisitions IV, LLC (4997); RML Acquisitions IX, LLC (4410); RML Acquisitions V, LLC (9532); RML Acquisitions VI, LLC (9640); RML Acquisitions VII, LLC (7747); RML Acquisitions VIII, LLC (7459); RML Acquisitions X, LLC (1009); RML Acquisitions XI, LLC (2651); RML Acquisitions XII, LLC (4226); RML Acquisitions XIII, LLC (9614); RML Acquisitions XIV, LLC (1910); RML Acquisitions XV, LLC (5518); RML Bronze Films, LLC (8636); RML Damascus Films, LLC (6024); RML Desert Films, LLC (4564); RML Documentaries, LLC (7991); RML DR Films, LLC (0022); RML Echo Films, LLC (4656); RML Escobar Films LLC (0123); RML Film Development, LLC (3567); RML Films PR, LLC (1662); RML Hector Films, LLC (6054); RML Hillsong Films, LLC (3539); RML IFWT Films, LLC (1255); RML International Assets, LLC (1910); RML Jackson, LLC (1081); RML Kidnap Films, LLC (2708); RML Lazarus Films, LLC (0107); RML Nina Films, LLC (0495); RML November Films, LLC (9701); RML Oculus Films, LLC (2596); RML Our Father Films, LLC (6485); RML Romeo and Juliet Films, LLC (9509); RML Scripture Films, LLC (7845); RML Solace Films, LLC (5125); RML Somnia Films, LLC (7195); RML Timeless Productions, LLC (1996); RML Turkeys Films, LLC (8898); RML Very Good Girls Films, LLC (3685); RML WIB Films, LLC (0102); Rogue Digital, LLC (5578); Rogue Games, LLC (4812); Roguelife LLC (3442); Safe Haven Productions, LLC (6550); Sanctum Films, LLC (7736); Santa Claus Productions, LLC (7398); Smith Point Productions, LLC (9118); Snow White Productions, LLC (3175); Spy Next Door, LLC (3043); Story Development, LLC (0677); Straight Wharf Productions, LLC (5858); Strangers II, LLC (6152); Stretch Armstrong Productions, LLC (0213); Studio Merchandise, LLC (5738); Summer Forever Productions, LLC (9211); The Crow Productions, LLC (6707); Totally Interns, LLC (9980); Tribes of Palos Verdes Production, LLC (6638); Tuckernuck Music, LLC (8713); Tuckernuck Publishing, LLC (3960); Wright Girls Films, LLC (9639); Yuma, Inc. (1669); Zero Point Enterprises, LLC (9558). The location of the Debtors' corporate headquarters is: 9242 Beverly Blvd., Suite 300, Beverly Hills, CA 9021

6. Holders of Claims against the Debtors as of December 17, 2015 (the Record Date established by the Court in the Disclosure Statement Order) in a Class entitled to vote on the Plan, will receive a Solicitation Package. The Solicitation Package includes, among other things, a ballot form (a “**Ballot**”) and voting instructions appropriate for such Claim, as well as copies of the Plan and Disclosure Statement and related solicitation materials.

7. The deadline to return completed Ballots is 4:00 p.m. (Prevailing Eastern Time) on January 20, 2016 (the “**Voting Deadline**”). Any failure to follow the voting instructions included with the Ballot or to return a properly completed Ballot so that it is received by the Voting Deadline may disqualify the Ballot. **You are encouraged to read the voting instructions carefully and review the Disclosure Statement before voting.**

8. Pursuant to the Plan, Classes A, F, H, I, K and L are not entitled to vote on the Plan.

9. **In connection with confirmation of the Plan, the Debtors are seeking approval of certain releases, including releases of certain nondebtor entities, that will become effective and binding on the Effective Date in accordance with the terms of the Plan and the Confirmation Order. These releases are described in detail in SECTION X of the Plan and SECTION IX of the Disclosure Statement.**

10. You may also be a counterparty to an executory contract or unexpired lease that the Debtors seek to assume or reject as part of the Plan. As further detailed and qualified in Section IV of the Plan, the Debtors generally seek to assume all executory contracts or unexpired leases unless otherwise specified.

11. Objections, if any, to the confirmation of the Plan including objections to the assumption or rejection of any executory contract or unexpired lease must: (a) be in writing; (b) state the name and address of the objecting party and the nature of the Claim or Interest of such party; (c) state with particularity the basis and nature of any objection; and (d) be filed with the Bankruptcy Court and served on the following parties **so that they are received no later than 4:00 p.m. (Prevailing Eastern Time) on January 21, 2016:**

- a) the Debtors, c/o Relativity Fashion, LLC, 9242 Beverly Blvd., Suite 300, Beverly Hills, California 90210 (Attn: Ramon Wilson, Andy Levin and Carol Genis);
- b) co-counsel to the Debtors, Jones Day, 222 East 41st Street, New York, New York 10017 (Attn: Richard L. Wynne, Bennett L. Spiegel and Lori Sinanyan) and Sheppard Mullin Richter & Hampton LLP, 30 Rockefeller Plaza, New York, New York 10012 (Attn: Craig A. Wolfe, Malani J. Cademartori and Blanka K. Wolfe);
- c) the Office of the United States Trustee, Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Susan Golden and Serene Nakano);
- d) counsel to Plan Co-Proponent Kavanaugh at Skadden, Arps, Slate, Meagher & Flom LLP, 4 Times Square, New York, New York 10036 (Attn: Van C. Durrer II and Shana Elberg);
- e) counsel to Plan Co-Proponent Nicholas at Taft Stettinius & Hollister LLP, 111 E. Wacker Drive, Suite 2800, Chicago, Illinois 60601-3713 (Attn: Michael A. Cramarosso);

- f) counsel to the Creditors' Committee, Togut, Segal & Segal LLP, One Penn Plaza, Suite 3335, New York, New York 10119 (Attn: Albert Togut and Frank Oswald);
- g) the SEC; and
- h) all other parties in interest that have filed requests for notice pursuant to Bankruptcy Rule 2002 in the Debtors' chapter 11 cases.

Any party's objection to the assumption of its executory contract or unexpired lease as part of the Debtors' sale motion (at Dkt. 25) that was otherwise preserved in the relevant sale orders (at Dkts. 768, 852, and 876) is deemed moot. Such party must refile and renotice its objection **on or before January 21, 2016**, but may attach or otherwise refer to its previous filing for convenience.

For purposes of filing pleadings in these cases, the address of the Bankruptcy Court is One Bowling Green, New York, New York 10004. Attorneys may also file pleadings on the Bankruptcy Court's Document Filing System (ECF) by completing and submitting the Electronic Filing Registration Form, available on the Bankruptcy Court's website at www.nysb.uscourts.gov.

12. The Confirmation Hearing may be continued from time to time without further notice other than the announcement of the adjourned date at the Confirmation Hearing or any continued hearing.

Dated: December 23, 2015

/s/ Lori Sinanyan

Bennett L. Spiegel, Esq.

Richard L. Wynne, Esq.

Lori Sinanyan, Esq. (admitted *pro hac vice*)

JONES DAY

222 East 41st Street

New York, NY 10017

Tel: (212) 326-3939

Fax: (212) 755-7306

-and-

Craig A. Wolfe, Esq.

Malani J. Cademartori

Blanka K. Wolfe, Esq.

SHEPPARD MULLIN RICHTER & HAMPTON LLP

30 Rockefeller Plaza

New York, NY 10112

Tel: (212) 653-8700

Fax: (212) 653-8701

Attorneys For Debtors And Debtors In Possession