

Craig A. Wolfe, Esq.
Malani J. Cademartori, Esq.
Blanka K. Wolfe, Esq.
SHEPPARD MULLIN RICHTER & HAMPTON LLP
30 Rockefeller Plaza
New York, NY 10112
Tel: (212) 653-8700
Fax: (212) 653-8701

- and -

Richard L. Wynne, Esq.
Bennett L. Spiegel, 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

Co-Counsel to the Debtors and Debtors in Possession

**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 AGENDA OF MATTERS SCHEDULED
FOR THE HEARING ON DECEMBER 16, 2015 AT 11:00 A.M. (ET)**

Location of Hearing: The Honorable Michael E. Wiles, Courtroom 617
United States Bankruptcy Court for the Southern
District of New York
One Bowling Green, New York, NY 10004.

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

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 90210.

I. CONTESTED MATTER:

1. Debtors' Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice **[Dk. 993]**.

Response Deadline: December 11, 2015 at 4:00 p.m. (Eastern Time). Extended to December 14, 2015 at 12:00 p.m. (Eastern Time) for certain parties in interest.

Responses Received:

- A. Limited Objection of Danone Waters of America, Inc. to Debtors' (A) Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice, and (B) Motion for an Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan Proponents' Plan of Reorganization, (II) Shortening Time for Notice of Confirmation Objection Deadline and Confirmation Hearing, (III) Approving Related Notice Procedures and (IV) Scheduling Confirmation Hearing **[Dk. 1091]**.
- B. IATM, LLC's Comments/Objections to Debtors' Disclosure Statement **[Dk. 1098]**.
- C. Limited Objection Of Discovery Communications, LLC to Debtors' Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice **[Dk. 1101]**.
- D. Statement of the Heatherden Parties Regarding Motion for Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice **[Dk. 1102]**.
- E. Limited Objection of Silver Reel Entertainment Mezzanine Fund, L.P., to Debtors' Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice **[Dk. 1103]**.
- F. Statement and Reservation of Rights by the Union Entities in Response to the Debtors' Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice **[Dk. 1104]**.

- G. Objection to Disclosure Statement on Behalf of VII Peaks Capital, LLC **[Dk. 1106]**.
- H. Objections of LAMF LLC to Adequacy of Disclosure Statement **[Dk. 1107]**.
- I. Objections of QNO, LLC to Adequacy of Disclosure Statement **[Dk. 1108]**.
- J. Objections of UniFi Completion Guaranty Insurance Solutions, Inc. as Agent and Attorney-in-Fact for Homeland Insurance Company of New York to Adequacy of Disclosure Statement **[Dk. 1114]**.
- K. Statement and Reservation of Rights of Netflix, Inc. in Response to Debtor's Motion for an Order Approving Disclosure Statement for Plan Proponents' Plan of Reorganization **[Dk. 1115]**.
- L. Reservation of Rights of CIT Bank, N.A. as Administrative Agent **[Dk. 1117]**.
- M. Reservation of Rights of RKA Film Financing, LLC with Respect to Disclosure Statement Filed by the Plan Proponents **[Dk. 1118]**.
- N. Objection of CIT Bank, N.A. to Debtors' Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice **[Dk. 1123]**.

Related Documents:

- A. Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 991]**.
- B. Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 992]**.
- C. Notice of (I) Deadline for Filing Objections to Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Hearing to Consider Approval of Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 994]**.
- D. Order Granting the Debtors' Motion to Shorten Time for Notice of Deadline to Object to Approval of Disclosure Statement and Hearing on Approval of Disclosure Statement **[Dk. 995]**.

- E. Corrected Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code [**Dk. 1009**].
- F. Notice of Filing Redlined Pages to Corrected Disclosure Statement [**Dk. 1018**].
- G. Debtors' Omnibus Reply to Objections to: (A) Debtors' Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice; and (B) Debtors' Motion for an Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan Proponents' Plan of Reorganization, (II) Shortening Time for Notice of Confirmation Objection Deadline and Confirmation Hearing, (III) Approving Related Notice Procedures and (IV) Scheduling Confirmation Hearing [**Dk. 1119**].
- H. Notice of Filing of Amended Plan and Disclosure Statement [**Dk. 1120**].
- I. Declaration of Walter H. Curchack, Esq. in Support of Objection of CIT Bank, N.A. to Debtors' Motion for an Order (I) Approving Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice [**Dk. 1124**].

Status: **This matter is going forward on a contested basis.**

- 2. Debtors' Motion for an Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan Proponents' Plan of Reorganization, (II) Shortening Time for Notice of Confirmation Objection Deadline and Confirmation Hearing, (III) Approving Related Notice Procedures and (IV) Scheduling Confirmation Hearing [**Dk. 1043**].

Response Deadline: December 9, 2015 at 4:00 p.m. (Eastern Time).

Responses Received:

- A. Limited Objection of Danone Waters of America, Inc. to Debtors' (A) Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice, and (B) Motion for an Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan Proponents' Plan of Reorganization, (II) Shortening Time for Notice of Confirmation Objection Deadline and Confirmation Hearing, (III) Approving Related Notice Procedures and (IV) Scheduling Confirmation Hearing [**Dk. 1091**].

Related Documents:

- A. Notice of Hearing on Debtors' Motion for an Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan Proponents' Plan of Reorganization, (II) Shortening Time for Notice of Confirmation Objection Deadline and Confirmation Hearing, (III) Approving Related Notice Procedures and (IV) Scheduling Confirmation Hearing **[Dk. 1044]**.
- B. Debtors' Omnibus Reply to Objections to: (A) Debtors' Motion for an Order Approving (I) Disclosure Statement for Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Form of Disclosure Statement Notice; and (B) Debtors' Motion for an Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan Proponents' Plan of Reorganization, (II) Shortening Time for Notice of Confirmation Objection Deadline and Confirmation Hearing, (III) Approving Related Notice Procedures and (IV) Scheduling Confirmation Hearing **[Dk. 1119]**.

Status: **This matter is going forward on a contested basis.**

II. UNCONTESTED MATTERS:

- 1. Application of the Official Committee of Unsecured Creditors of Relativity Fashion, LLC, *et al.* for Entry of an Order Pursuant to Bankruptcy Code Sections 327(a) and 1103(a), Bankruptcy Rules 2014(a) and 2016(a) and Local Rules 2014-1 and 2016-1 Authorizing Retention and Employment of Drinker Biddle & Reath LLP as Its Special Counsel, *Nunc Pro Tunc* to August 27, 2015 **[Dk. 924]**.

Response Deadline: December 9, 2015 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents: None.

Status: **This matter is going forward on an uncontested basis.**

- 2. Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to Employ and Retain Robert A. Kors as Chief Consultant *Nunc Pro Tunc* to the Engagement Date **[Dk. 1030]**.

Response Deadline: December 9, 2015 at 4:00 p.m. (Eastern Time). Extended to December 11, 2015 at 4:00 p.m. (Eastern Time) for the United States Trustee and the Creditors' Committee.

Responses Received: None.

Related Documents:

- A. Notice of Hearing on Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to Employ and Retain Robert A. Kors as Chief Consultant *Nunc Pro Tunc* to the Engagement Date [Dk. 1031].
- B. Supplement to Debtors' Motion for an Order to Employ and Retain Robert A. Kors as Chief Consultant *Nunc Pro Tunc* to the Engagement Date [Dk. 1126].

Status: **This matter is going forward on an uncontested basis.**

- 3. Debtors' Motion for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 345(b) Waiving the Requirements of 11 U.S.C. § 345(b) for Certain of the Debtors' Bank Accounts [Dk. 1054].

Response Deadline: December 11, 2015 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Debtors' Motion to Shorten Time for Notice of the Hearing to Consider the Debtors' Motion for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 345(b) Waiving the Requirements of 11 U.S.C. § 345(b) for Certain of the Debtors' Bank Accounts [Dk. 1055].
- B. Order Granting the Debtors' Motion to Shorten Time for Notice of the Hearing to Consider the Debtors' Motion for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 345(b) Waiving the Requirements of 11 U.S.C. § 345(b) for Certain of the Debtors' Bank Accounts [Dk. 1057].
- C. Notice of Hearing of Debtors' Motion for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 345(b) Waiving the Requirements of 11 U.S.C. § 345(b) for Certain of the Debtors' Bank Accounts [Dk. 1060].

Status: **This matter is going forward on an uncontested basis.**

- 4. Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) Authorizing Payment Under a Fee Letter to Co-Lead Arrangers Aperture Media Partners, LLC and EMP Media Partners LLC [Dk. 1058].

Response Deadline: December 11, 2015 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Debtors' Motion to Shorten Time for Notice of the Hearing to Consider the Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105(a) and

363(b) Authorizing Payment Under a Fee Letter to Co-Lead Arrangers Aperture Media Partners, LLC and EMP Media Partners LLC **[Dk. 1059]**.

- B. Order Granting the Debtors' Motion to Shorten Time for Notice of the Hearing to Consider the Debtors' Motion for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 345(b) Waiving the Requirements of 11 U.S.C. § 345(b) for Certain of the Debtors' Bank Accounts **[Dk. 1061]**.
- C. Notice of Hearing of Debtors' Motion for an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) Authorizing Payment Under a Fee Letter to Co-Lead Arrangers Aperture Media Partners, LLC and EMP Media Partners LLC **[Dk. 1064]**.

Status: **This matter is going forward on an uncontested basis.**

III. RESOLVED MATTER:

- 1. Motion of Identical Production Company, LLC to Compel Debtors to Assume or Reject Contract, or, in the Alternative, for Adequate Protection Payments **[Dk. 999]**.

Response Deadline: December 9, 2015 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Declaration of Yochanan Marcellino in Support of Identical Production Company, LLC's Motion to Compel Debtors to Assume or Reject Contract, or, in the Alternative, for Adequate Protection Payments **[Dk. 1000]**.
- B. Notice of Hearing of Motion of Identical Production Company, LLC to Compel Debtors to Assume or Reject Contract, or, in the Alternative, for Adequate Protection Payments **[Dk. 1001]**.

Status: **This matter is resolved and is not going forward at the December 16, 2015 hearing.**

IV. MATTER NOT GOING FORWARD:

- 1. Emergency Motion for the Setting of a Hearing in this Action, and for an Order Directing VII Peaks to Pay \$30 Million into the Court's Registry or, in the Alternative, a Restraining Order **[Dk. 2, Adv. Pro. No. 15-01361 (MEW)]**.

Response Deadline: Not applicable.

Responses Received:

- A. Response of Defendant VII Peaks Capital, LLC in Opposition to Plaintiff's Emergency Motion for the Setting of a Hearing in this Action and for an Order Directing VII Peaks to Pay \$30 Million into the Court's Registry or, in the Alternative, a Restraining Order [**Dk. 15**].

Related Documents:

- A. Complaint for Emergency Order Requiring VII Peaks Capital, LLC to Pay \$30 Million into the Court's Registry and/or Issuing a Restraining Order and Directing Specific Performance [**Dk. 1**].
- B. Declaration of Van C. Durrer, II [**Dk. 3**].
- C. Ex Parte Order to Show Cause and Temporary Restraining Order [**Dk. 4**].

Status: **This matter is not going forward.**

Dated: December 14, 2015
New York, New York

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By: /s/ Malani J. Cademartori
Craig A. Wolfe, Esq.
Malani J. Cademartori, Esq.
Blanka K. Wolfe, Esq.
30 Rockefeller Plaza
New York, New York 10112
Tel: (212) 653-8700
Fax: (212) 653-8701
E-mail: cwolfe@sheppardmullin.com
mcademartori@sheppardmullin.com
bwolfe@sheppardmullin.com

-and-

JONES DAY
Richard L. Wynne, Esq.
Bennett L. Spiegel, Esq.
Lori Sinanyan, Esq. (admitted *pro hac vice*)
222 East 41st Street
New York, NY 10017
Tel: (212) 326-3939
Fax: (212) 755-7306
E-mail: rlwynne@jonesday.com
blspiegel@jonesday.com
lsinanyan@jonesday.com

Co-Counsel to the Debtors and Debtors in Possession