

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

- and -

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

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 AMENDED AGENDA OF MATTERS SCHEDULED FOR
THE HEARING ON FEBRUARY 1, 2016 AT 10:00 A.M. (EASTERN TIME)**

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 MATTERS:

1. Second Amended Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1143]**.

Response Deadline: January 21, 2016 at 4:00 p.m. (Eastern Time).

Responses Received:

- A. Reservation of Rights of CIT Bank, N.A. as Administrative Agent, with Respect to Certain Plan and Confirmation Matters **[Dk. 1259]**.
- B. Objections of the Weinstein Company, LLC to Proposed Assumption of Executory Contracts Under Plan of Reorganization and Associated Cure Amounts **[Dk. 1288]**.
- C. Reservation of Rights of Macquarie US Trading LLC and Macquarie Investments US Inc. **[Dk. 1307]**.
- D. Google Inc.'s Limited Objection to the Plan Proponents' Second Amended Plan of Reorganization with Respect to Debtors' Possible Assumption of Google's Contract and Proposed Cure Amount **[Dk. 1309]**.
- E. The Film Musician Fund's Conditional Opposition to Confirmation of Debtors' Second Amended Chapter 11 Plan of Reorganization **[Dk. 1313]**.
- F. Objection of Christie Digital Systems USA, Inc. to Plan Proponents' Second Amended Plan of Reorganization and Proposed Cure Amount **[Dk. 1315]**.
- G. Objection of Scrabble Ventures LLC to Plan Proponents' Second Amended Plan of Reorganization and Proposed Cure Amount **[Dk. 1316]**.
- H. Supplemental Objection of Mitchell Grossbach to Debtors' Assumption of Agreements Between Himself and the Debtors **[Dk. 1319]**.
- I. Objections of QNO, LLC to Proposed Assumption of Executory Contracts Under Plan and Associated Cure of Defaults **[Dk. 1320]**.
- J. Limited Objection of Viacom International Inc. to the Debtors' Proposed Assumption of the License Agreement and Cure Amount **[Dk. 1321]**.
- K. Limited Objection and Reservation of Rights of Paramount Pictures Corporation with Respect to Confirmation of the Plan and Proposed Assumption of the Distribution Agreement **[Dk. 1322]**.

- L. Objection of Sony Music Entertainment to the Debtors' Proposed Assumption of Certain License Agreements and Cure Amounts [**Dk. 1323**].
- M. Objection of Digital Cinema Implementation Partners, LLC and Kasima, LLC to the Debtors' Proposed Assumption of an Executory Contract or Contracts [**Dk. 1324**].
- N. Objection of Comcast Spotlight, LP, and Comcast Cable Communications, LLC, to the Proposed Assumption of and Proposed Cure Amounts for Certain Contracts Under the Plan Proponents' Second Amended Plan of Reorganization [**Dk. 1326**].
- O. Bev/Early, LLC's Reservation of Rights with Respect to the Rejection of Executory Contracts Under the Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code [**Dk. 1327**].
- P. Objection of PureBrands, LLC to Debtors' Proposed Rejection of Limited Liability Company Agreement Listed on Exhibit E to the Plan Supplement [**Dk. 1328**].
- Q. Cure Claim of Relativity Education, LLC with Respect to Assumption of Limited Liability Company Agreement Under the Plan Proponents' Plan of Reorganization [**Dk. 1329**].
- R. Objection of LAMF LLC to Proposed Assumption of Executory Contract Under Plan and Associated Cure Amounts [**Dk. 1330**].
- S. Limited Objection to Confirmation of Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code [**Dk. 1331**].
- T. Statement and Reservation of Rights by the Directors Guild of America, Inc. Screen Actors Guild – American Federation of Television and Radio Artists, Writers Guild of America West, Inc., Each of Their Respective Pension and Health Plans, and the Motion Picture Industry Pension and Health Plans re Confirmation of the Plan Proponent's Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code [**Dk. 1333**].
- U. Objections of IATM, LLC; Bandito Brothers, LLC; Bandito Films, Inc.; Scott Waugh; Mouse McCoy, Jay Pollak; Jacob Rosenberg; and Bret Anthony Johnston to Plan Proponents' Second Amended Plan of Reorganization [**Dk. 1334**].
- V. Objections of IATM, LLC; Bandito Brothers, LLC; Bandito Films, Inc.; Scott Waugh; Mouse McCoy; Jay Pollak; Jacob Rosenberg; and Bret

Anthony Johnston to Debtors' Assumption of Executory Contracts **[Dk. 1336]**.

- W. Objection of Brett Ratner and Rat Entertainment, Inc. to Plan Proponents' Second Amended Plan of Reorganization and Proposed Cure Amount **[Dk. 1337]**.
- X. Objection of CIT Bank, N.A., as Administrative Agent, to Confirmation of Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1339]**.
- Y. Objection of Discovery Communications, LLC to Plan Proponents' Second Amended Plan of Reorganization **[Dk. 1340]**.
- Z. Nicholas Sparks Production's Reservation of Rights Re Plan Proponents' Second Amended Chapter 11 Plan of Reorganization **[Dk. 1341]**.
- AA. Objections of UNIFI Completion Guaranty Insurance Solutions, Inc. as Agent and Attorney-in-Fact for Homeland Insurance Company of New York to Assumption of UNIFI Contracts in Connection with Plan of Reorganization and (ii) Associated Cure of Defaults **[Dk. 1342]**.
- BB. Limited Objection of the Colbeck Parties to Debtors' Proposed Rejection of Certain Contracts Listed on Exhibit E to the Plan Supplement **[Dk. 1344]**.
- CC. Objection of Silver Reel Entertainment Mezzanine Fund, L.P. for Itself and on Behalf of Supersensory LLC to Plan Proponents' Proposed Cure Amount in Second Amended Plan of Reorganization **[Dk. 1345]**.
- DD. Limited Objection to Plan Proponents' Second Amended Plan of Reorganization with Respect to Debtors' Proposed Assumption of Beverly Place, L.P.'s Lease and Proposed Cure Amount **[Dk. 1346]**.
- EE. Objection and Reservation of Rights of Danone Waters of America, Inc. With Respect to Confirmation of Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1347]**.
- FF. Objection of Netflix, Inc. to Assumption of License Agreements Between the Debtors and Netflix and to Confirmation of Plan of Reorganization **[Dk. 1352]**.
- GG. Objection of VII Peaks Co-Optivist Income BDC II, Inc., VII Peaks Capital FBO Marquette and VII Peaks-R-Holdings, Inc. to Confirmation of Debtors' and Plan Proponents' Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1353]**.

- HH. Errata to Nicholas Sparks Production's Reservation of Rights Re Plan Proponents' Second Amended Chapter 11 Plan of Reorganization [**Dk. 1361**].
- II. Voltage Pictures, LLC's Objection to Debtors' Proposed Cure Amount in Connection with Assumption of Executory Contract Under the Proposed Plan (Exclusive License Agreement Between Voltage Pictures, LLC and Don Jon Acquisition, LLC and RML Domestic Distribution, LLC) [**Dk. 1362**].
- JJ. Objection and Reservation Of Rights Of Buck McDonald Productions, LLC To Debtors' Proposed Assumption Of Executory Contracts [**Dk. 1375**].
- KK. Limited Objection of Riccardo Tisci S.R.L. and Riccardo Tisci to Confirmation of Second Amended Plan of Reorganization [**Dk. 1377**].
- LL. Objection of Andrew Matthews to Proposed Rejection of Certain Executory Contracts Pursuant to the Second Amended Plan of Reorganization and Section 365 of the Bankruptcy Code [**Dk. 1388**].
- MM. Objection of the Weinstein Company, LLC to Proposed Rejection of "Executory Contracts" Under Plan of Reorganization [**Dk. 1392**].
- NN. Limited Objection of Cinedigm Digital Cinema Corp. to Debtors' Proposed Cure Amounts in Connection with Assumption of Executory Contracts Pursuant to Second Amended Plan of Reorganization [**Dk. 1402**].
- OO. Limited Objection and Reservation of Rights of Filmnation International, LLC to Assumption and Assignment of Executory Contracts and Cure Amounts [**Dk. 1407**].
- PP. Limited Objection and Reservation of Rights of LMB Holdings Limited [**Dk. 1408**].
- QQ. Objection of Europacorp S.A. to the Debtors' Plan of Reorganization and Assumption of Executory Contracts Thereunder [**Dk. 1409**].
- RR. Objection of Europacorp Films USA, Inc. to the Debtors' Plan of Reorganization and Assumption of Executory Contract Thereunder [**Dk. 1411**].
- SS. Objection of CIT Bank, N.A., as Production Loan Agent and Lender to Confirmation of Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Code [**Dk. 1414**].

- TT. Limited Objection of Universal Music Enterprises and Universal Music Publishing Group to the Debtors' Proposed Assumption of Executory Contracts and Cure Amounts Pursuant to its Second Amended Plan of Reorganization **[Dk. 1429]**.
- UU. Bold Films Productions, LLC (1) Objection to Proposed Assumption of Exclusive License Agreement and (2) Objection to Plan Confirmation **[Dk. 1442]**.
- VV. Reservation Of Rights of CIT Bank, N.A., as Production Loan Agent and Lender, with Respect to Objection of Netflix, Inc. to Assumption of License Agreements Between the Debtors and Netflix and to Confirmation of Plan of Reorganization **[Dk. 1478]**.
- WW. Reservation of Rights of CIT Bank, N.A., as Production Loan Agent and Lender, with Respect to Objection of Unifi Completion Guaranty Insurance Company to Assumption of Unifi Contracts in Connection with Plan of Reorganization and Associated Cure of Defaults **[Dk. 1479]**.
- XX. First Supplement to Objection of VII Peaks Co-Optivist Income BDC II, Inc., VII Peaks Capital FBO Marquette And VII Peaks-R Holdings, Inc. to Confirmation Of Debtors' and Plan Proponents' Further Revise Plan of Reorganization **[Dk. 1484]**.
- YY. Reservation of Rights of Danone Waters of America, Inc. with Respect to Confirmation of Plan Proponents' Second Amended Plan for Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1493]**.

Related Documents:

- A. Order Approving Second Amended Disclosure Statement for Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1140]**.
- B. Order Approving Debtors' Motion for an Order (i) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan Proponents' Plan of Reorganization, (ii) Scheduling the Time for Notice of Confirmation Objection Deadline and Confirmation Hearing, (iii) Approving Related Notice Procedures and (iv) Scheduling Confirmation Hearing **[Dk. 1141]**.
- C. Notice of Filing of Plan Proponents' Second Amended Plan and Second Amended Disclosure Statement **[Dk. 1143]**.
- D. Notice of Filing of Plan Supplement for Those Receiving the Solicitation Package Related to the Plan Proponents' Second Amended Plan of

Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1238]**.

- E. Notice of Filing of Plan Supplement Exhibit E Related to the Plan Proponents Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1239]**.
- F. Notice of Filing of Amended and Restated Exhibit J to the Plan Supplement for those Receiving the Solicitation Package Related to the Plan Proponents' Second Amended and Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1240]**.
- G. Notice of Filing of Second Amended and Restated Exhibit J to the Plan Supplement for those Receiving the Solicitation Package Related to the Plan Proponents Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1246]**.
- H. Declaration of Brett Ratner in Support of Objection of Brett Ratner and Rat Entertainment, Inc. to Plan Proponents Second Amended Plan of Reorganization and Proposed Cure Amount **[Dk. 1338]**.
- I. Notice of Refiling of (1) Reservation of Rights and (2) Declaration of Thomas Augsburg [Related to Dk. 1345] **[Dk. 1351]**.
- J. Declaration of Robert Roy in Support of Objection of Netflix, Inc. to Assumption of License Agreements Between the Debtors and Netflix and to Confirmation of Plan of Reorganization [Filed Under Seal] [Related to Dk. 1352] **[Dk. 1355]**.
- K. Notice of Filing of Corrected Exhibits to Declarations in Support of Objection of Silver Reel Entertainment Mezzanine Fund, L.P. for Itself and on Behalf of Supersensory LLC [Related to Dk. 1345] **[Dk. 1364]**.
- L. Order Signed on 1/25/2016 Granting Motion of Silver Reel Entertainment Mezzanine Fund, L.P. for Itself and on behalf of Supersensory LLC for an Order Authorizing the Filing of the Solace Agreement Under Seal **[Dk. 1391]**.
- M. Notice of Filing of Redacted Version of the Solace Agreement **[Dk. 1401]**.
- N. Declaration of Walter H. Curchack in Support of Objection of CIT Bank, N.A., as Production Loan Agent and Lender, to Confirmation of Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Code **[Dk. 1420]**.
- O. Declaration of Gregory Schwed in Support of (1) Objection to Proposed Assumption of Exclusive License Agreement and (2) Objection To Plan Confirmation [Related to Dk. 1442] **[Dk. 1443]**.

- P. Order Authorizing Filing of Document Containing Confidential Information Under Seal **[Dk. 1445]**.
- Q. Declaration of Jung W. Song on Behalf of Donlin, Recano & Company, Inc. Regarding Voting and Tabulation of Ballots Accepting and Rejecting Plan Proponents Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1459]**.
- R. Notice of Filing of Redacted Version of The Representation Agreement **[Dk. 1462]**.
- S. Debtors' (I) Memorandum of Law in Support of Confirmation of Third Amended and Restated Plan and (II) Omnibus Reply to Objections with Respect to Plan and Related Proceedings **[Dk. 1472]**.
- T. Letter to Hon. Michael E. Wiles Regarding Request for Adjournment of Confirmation Hearing **[Dk. 1476]**.
- U. Letter to Hon. Michael E. Wiles Regarding CIT's Request for Adjournment of Confirmation Hearing **[Dk. 1483]**.
- V. Notice of Exhibits to Limited Objection of the Colbeck Parties to Debtors' Proposed Rejection of Certain Contracts Listed on Exhibit E to the Plan Supplement **[Dk. 1485]**.
- W. Order Denying Request for Adjournment of Confirmation Hearing **[Dk. 1491]**.
- X. Letter to Hon. Michael E. Wiles Regarding Request for Continuance of Confirmation Hearing **[Dk. 1498]**.
- Y. Plan Proponents' Third Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1499]**.
- Z. Notice of Filing of Amended and Restated Exhibit J to the Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code **[Dk. 1502]**.
- AA. Declaration Of Dana Brunetti **[Dk. 1503]**.
- BB. Declaration Of Joseph G. Nicholas **[Dk. 1504]**.
- CC. Declaration Of Matthew R. Niemann In Support Of Confirmation Of The Plan Proponents' Third Amended Plan Of Reorganization Pursuant To Chapter 11 Of The Bankruptcy Code And Related Matters **[Dk. 1505]**.

- DD. Ex Parte Motion to File Under Seal Ex Parte Motion To File Under Seal Houlihan Lokey Expert Valuation Report Regarding Film Library [Dk. 1506].
- EE. Amended Plan Notice of Filing of Amended and Restated Exhibits E-1, E-2 and E-3 to the Plan Proponents' Third Amended and Restated Plan of Reorganization [Dk. 1507].
- FF. Letter to Hon. Michael E. Wiles in Response to Netflix Request for Continuance of Confirmation Hearing [Dk. 1508].
- GG. Declaration of Ronald E. Hohauser In Support Of Confirmation Of The Plan Proponents' Third Amended Plan Of Reorganization Pursuant To Chapter 11 Of The Bankruptcy Code And Related Matters [Dk. 1509].
- HH. Supplement to Debtors' (I) Memorandum of Law in Support of Confirmation of Third Amended Plan of Reorganization and (II) Omnibus Reply to Objections with respect to Plan and related proceedings [Dk. 1510].

Status: This matter is going forward as a contested matter as to Objections at Docket Nos. 1259, 1320, 1334, 1339, 1342, 1344, 1345, 1352, 1414, 1442. Related documents to such Objections are at Docket Nos. 1350, 1351, 1355, 1364, 1401, 1420, 1443, 1485. This matter is going forward as a contested matter as to the Reservations at Docket Nos. 1307, 1333, and 1377.

Adjourned by Agreement of the Parties: Docket Nos. 1288, 1307, 1309, 1315, 1316, 1321, 1323, 1324, 1326, 1327, 1328, 1329, 1331, 1336, 1337, 1338, 1341, 1346, 1361, 1362, 1375, 1388, 1392 1402, 1407, 1408, 1409, 1411, 1429 have been adjourned to February 17, 2016 (or later date if requested).

Resolved: The Debtors believe the matters at Docket Nos. 1313, 1319, 1322, 1330, 1340, 1347, 1353, 1484 to be resolved among the parties.

II. UNCONTESTED MATTER:

1. Debtors' Motion for Entry of Order, Pursuant to 11 U.S.C. §§ 363 and 365, for Authorization to (I) Assume Amended Agreement Between RML Distribution Domestic, LLC and Carat USA, Inc. with Respect to Advertising and (II) Pay Related Cure Costs [Dk. 1281].

Response Deadline: January 25, 2016 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Debtors' Ex Parte Motion to File Under Seal Certain Portions of the Debtors' Motion for Entry of an Order, Pursuant to 11 U.S.C. §§ 363 and 365, for Authorization to (I) Assume Amended Agreement Between RML Distribution Domestic, LLC and Carat USA, Inc. with Respect to Advertising and (II) Pay Related Cure Costs **[Dk. 1281]**.
- B. Order Granting Debtors' Ex Parte Motion to File Under Seal Certain Portions of the Debtors' Motion for Entry of an Order, Pursuant to 11 U.S.C. §§ 363 and 365, for Authorization to (I) Assume an Amended Agreement Between RML Distribution Domestic, LLC and Carat USA, Inc. with Respect to Advertising and (Ii) Pay Related Cure Costs **[Dk. 1433]**.
- C. Notice of Re-Filing of Redacted Debtors' Motion for Entry of Order, Pursuant to 11 U.S.C. §§ 363 and 365, for Authorization to (I) Assume Amended Agreement Between RML Distribution Domestic, LLC and Carat USA, INC. with Respect to Advertising and (II) Pay Related Cure Costs **[Dk. 1458]**.

Status: **This matter is going forward as an uncontested matter.**

- 2. Debtors' Motion for an Order Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure Authorizing Changed Votes of Certain Creditors Relating to the Plan of Reorganization **[Dk. 1455]**.

Response Deadline: February 1, 2016 at 9:59 a.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Debtors' Ex Parte Motion to Shorten Time for Notice of the Hearing to Consider the Debtors' Motion for Order Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure Authorizing Changed Votes of Certain Creditors Relating to the Plan of Reorganization **[Dk. 1456]**.
- B. Order Granting Debtors' Motion to Shorten Time for Notice of the Hearing to Consider the Debtors' Motion for Order Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure Authorizing Changed Votes of Certain Creditors Relating to the Plan of Reorganization **[Dk. 1457]**.

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

- 3. Notice of Presentment of Stipulation and Agreed Order **[Dk. 1376]**.

Response Deadline: January 29, 2016 at 1:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Notice of Filing of Redacted Version of The Representation Agreement [Dk. 1462].
- B. Order Authorizing Filing of Document Containing Confidential Information Under Seal [Dk. 1445].

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

- 4. Notice of Presentment of Stipulation and Agreed Order Regarding MICA Fund I, L.P [Dk. 1400].

Response Deadline: February 1, 2016 at 9:59 a.m. (Eastern Time).

Responses Received: None.

Related Documents: None.

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

- 5. Notice of Presentment of Stipulation and Agreed Order Regarding LAMF, LLC [Dk. 1454].

Response Deadline: February 1, 2016 at 9:59 a.m. (Eastern Time).

Responses Received: None.

Related Documents: None.

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

- 6. Notice of Presentment of Stipulation and Order of Settlement [Dk. 1461].

Response Deadline: February 1, 2016 at 9:59 a.m. (Eastern Time).

Responses Received: None.

Related Documents: None.

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

III. RESOLVED MATTER:

- 1. United Talent Agency's Motion To Withdraw Its Plan Ballot [Dk. 1386].

Response Deadline: February 1, 2016 at 9:59 a.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Order Granting United Talent Agency's Motion to Shorten Time For Notice Of The Hearing To Withdraw Its Plan Ballot **[Dk. 1387]**.
- B. Certificate of No Objection Regarding United Talent Agency's Motion to Withdraw Its Plan Ballot **[Dk. 1500]**.
- C. Stipulation and Agreed Order Between United Talent Agency and Debtors Regarding United Talent Agency's Motion to Withdraw Its Plan Ballot **[Dk. 1501]**.

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

IV. STATUS CONFERENCE:

- 1. The Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties **[Dk. 1223]**.

Response Deadline: January 18, 2016 at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- A. Objection of Debtors and Debtors in Possession to the Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties **[Dk. 1282]**.
- B. Joinder of Ryan Kavanaugh to Objection of Debtors and Debtors in Possession to the Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties **[Dk. 1283]**.

Related Documents:

- A. Ex Parte Motion of the Unsecured Creditors Committee for an Order Authorizing the Filing Under Seal of Certain Term Sheets **[Dk. 1225]**.
- B. Ex Parte Application for an Order Shortening Time for Notice of Hearing to Consider the Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy

Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties [Dk. 1226].

- C. Fourth Stipulation and Agreed Order Extending the Committee's Period to Commence a Manchester Challenge [Dk. 1228].
- D. Order Shortening Time for Notice of Hearing to Consider the Ex Parte Application for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties [Dk. 1229].
- E. The Official Committee of Unsecured Creditors' Amended Motion for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties [Dk. 1247].
- F. Manchester Parties' Reply in Support of the Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties [Dk. 1292].
- G. Reply of the Official Committee of Unsecured Creditors in Support of Its Amended Motion for an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving the Settlement Agreement Between the Committee and the Manchester Parties [Dk. 1294].

Status: **This matter is going forward solely as a status conference.**

Dated: January 31, 2016
New York, New York

JONES DAY

By: /s/ Lori Sinanyan
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