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**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 FILING OF AMENDMENT TO DOCKET NO. 1733, EXHIBIT E TO
THE PLAN PROPONENTS' FOURTH AMENDED AND RESTATED PLAN OF
REORGANIZATION PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on January 12, 2016, in accordance with *Plan Proponents' Second Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 1143; Ex. A], the above-captioned debtors in possession (collectively, the "**Debtors**"), along with Ryan C. Kavanaugh and Joseph Nicholas (together with the Debtors, the "**Plan Proponents**"), filed the *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* [Dkt No. 1239].

¹

The Debtors in these chapter 11 cases are as set forth on: see 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); RILL Distribution Domestic, LLC (6528); RILL Distribution International, LLC (6749); REMOLD Financing, LLC (9114); 21 & Over Productions, LLC (7796); 3 Days to Kill Productions, LLC (5747); A Perfect Getaway PER, 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); Kingpost, 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); Gotten Acquisitions, LLC (6562); Great Point Productions, LLC (5813); Guido Contain 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); JAG Acquisitions, LLC (9221); Left Behind Acquisitions, LLC (1367); Long Pond Media, LLC (7197); Madame Publishing, LLC (9356); Madame Road Music, LLC (9352); Mad vine MR., LLC (0646); Malaria Productions, LLC (8636); MB Productions, LLC (4477); Merchant of Shanghai Productions, LLC (7002); Mahomet 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); Pocono 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); RILL Acquisitions I, LLC (9406); RILL Acquisitions II, LLC (9810); RILL Acquisitions III, LLC (9116); RILL Acquisitions IV, LLC (4997); RILL Acquisitions IX, LLC (4410); RILL Acquisitions V, LLC (9532); RILL Acquisitions VI, LLC (9640); RILL Acquisitions VII, LLC (7747); RILL Acquisitions VIII, LLC (7459); RILL Acquisitions X, LLC (1009); RILL Acquisitions XI, LLC (2651); RILL Acquisitions XII, LLC (4226); RILL Acquisitions XIII, LLC (9614); RILL Acquisitions XIV, LLC (1910); RILL Acquisitions XV, LLC (5518); RILL Bronze Films, LLC (8636); RILL Damascus Films, LLC (6024); RILL Desert Films, LLC (4564); RILL Documentaries, LLC (7991); RILL DR Films, LLC (0022); RILL Echo Films, LLC (4656); RILL Escobar Films LLC (0123); RILL Film Development, LLC (3567); RILL Films PR, LLC (1662); RILL Hector Films, LLC (6054); RILL Hill song Films, LLC (3539); RILL FIT Films, LLC (1255); RILL International Assets, LLC (1910); RILL Jackson, LLC (1081); RILL Kidnap Films, LLC (2708); RILL Lazarus Films, LLC (0107); RILL Nina Films, LLC (0495); RILL November Films, LLC (9701); RILL Oculus Films, LLC (2596); RILL Our Father Films, LLC (6485); RILL Romeo and Juliet Films, LLC (9509); RILL Scripture Films, LLC (7845); RILL Solace Films, LLC (5125); RILL Sonia Films, LLC (7195); RILL Timeless Productions, LLC (1996); RILL Turkeys Films, LLC (8898); RILL Very Good Girls Films, LLC (3685); RILL WEB Films, LLC (0102); Rogue Digital, LLC (5578); Rogue Games, LLC (4812); Rogue life 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.

PLEASE TAKE FURTHER NOTICE that on January 30, 2016 , the Plan Proponents filed *the Notice of Filing of Plan Proponents' Third Amended Plan of Reorganization and Exhibit J Thereto* [Dkt. No. 1499].

PLEASE TAKE FURTHER NOTICE on January 31, 2016, the Plan Proponents filed the *Notice of Filing of Amended and Restated Exhibits E-1, E-2 and E-3 to the Plan Proponents' Third Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 1507].

PLEASE TAKE FURTHER NOTICE that on February 8, 2016, the Plan Proponents filed the *Notice of Filing of (I) Plan Proponents' Fourth Amended Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code and (II) Certain Exhibits Thereto* [Dkt. No. 1572], which the Court confirmed on March 18, 2016 [Dkt. No. 1676] (as confirmed, the "**Plan**").

PLEASE TAKE FURTHER NOTICE on March 23, 2016, the Plan Proponents filed the *Notice of Filing of Amended and Restated Exhibit E to the Plan Proponents' Fourth Amended and Restated Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 1692].

PLEASE TAKE FURTHER NOTICE on March 30, 2016, the Plan Proponents filed the *Notice of Filing of Amended and Restated Exhibit E to the Plan Proponents' Fourth Amended and Restated Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 1724].

PLEASE TAKE FURTHER NOTICE on March 31, 2016, the Plan Proponents filed the *Notice of Filing of Amendment to Docket No. 1724, Exhibit E to the Plan Proponents' Fourth*

Amended and Restated Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code
[Dkt. No. 1733].

PLEASE TAKE FURTHER NOTICE that Exhibit E to the Plan ("**Exhibit E**") identifies contracts that the Debtors intend to reject (E-1), contracts that the Debtors intend to assume with a cure amount greater than \$0 (E-2), and contracts that are not executory (E-3).

PLEASE TAKE FURTHER NOTICE that the Debtors intend to assume all contracts not listed on Exhibit E with a \$0 cure amount.

PLEASE TAKE FURTHER NOTICE that Exhibit E, last filed at Docket No. 1733, is amended as follows:

- Doc ID 366, Amended and Restated Executive Employment Agreement, as amended 8/9/2014, by and between Rosalind Lawton and Relativity Media, LLC **shall be removed from Exhibit E-2 and added to Exhibit E-1.**
- Doc ID 367, Amendment #1 to Amended and Restated Executive Employment Agreement, by and between Rosalind Lawton and Relativity Media, LLC dated 8/9/2014 **shall be removed from Exhibit E-2 and added to Exhibit E-1.**
- Doc ID 339, Agreement by and between Allied Advertising Limited Partnership and RML Distribution Domestic, LLC dated 8/23/2011 **shall be added to Exhibit E-1.**
- Doc ID 20112, Agreement by and between Allied Advertising and RML Distribution Domestic, LLC dated 8/23/2011 **shall be added to Exhibit E-1.**
- Doc ID 23018, Agreement by and between Allied Advertising Limited Partnership and RML Distribution Domestic, LLC dated 8/23/2011 **shall be added to Exhibit E-1.**
- Doc ID 9999934, Agreement by and between ServiceNOW, a subsidiary of Salesforce, and Relativity dated 3/25/2015 **shall be added to Exhibit E-1.**

PLEASE TAKE FURTHER NOTICE that this *Notice of Filing of Amendment to Docket No. 1733, Exhibit E to the Plan Proponents' Fourth Amended and Restated Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* (the "**Exhibit E Notice**") will be

filed on the docket in the Debtors' Chapter 11 Cases and served only on each party listed immediately above (the "**Affected Parties**").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Plan, each of the Affected Parties shall have five (5) business days to object to the Debtors' new treatment of their contracts.

PLEASE TAKE FURTHER NOTICE that the Debtors shall provide service by first-class mail to only the Affected Parties and shall add two (2) additional days for service, setting the **objection deadline at 4:00 p.m. (Eastern Time) on April 22, 2016.**

PLEASE TAKE FURTHER NOTICE that the Exhibit E Notice shall also be available in searchable format at <https://www.donlinrecano.com/Clients/rm/Index>.

PLEASE TAKE FURTHER NOTICE that a hearing to consider any possible objections to Exhibit E shall be held at the next omnibus hearing date on **May 18, 2016 at 11:00 a.m. (Eastern Time)**, before the Honorable Michael E. Wiles, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that Exhibit E is (i) not final, (ii) subject to ongoing review and change and (iii) remain subject to approval in accordance with the Plan. The Debtors reserve the right to alter, amend, modify or supplement Exhibit E any time up to and including the Effective Date of the Plan.

[Remainder of page intentionally left blank]

PLEASE TAKE FURTHER NOTICE that the Plan and Plan Supplement can be viewed for free at <https://www.donlinrecano.com/Clients/rm/Index>. Additionally, copies of the Plan and Plan Supplement are available upon request by contacting the Debtors' claims and noticing agent, Donlin Recano, (1) by telephone at (212) 771-1128, (2) by email at DRCVote@donlinrecano.com, or (3) in writing at 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. 844 224-1137 (917-962-8896 for international), or by accessing the Bankruptcy Court's website: www.nysb.uscourts.gov. A PACER password and login are needed to access documents on the Bankruptcy Court's website. A PACER password can be obtained at <http://www.pacer.psc.uscourts.gov>.

Dated: April 13, 2016

JONES DAY

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