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Attorneys for Reorganized Debtor
METROPOLITAN THEATRES CORPORATION, a
California corporation

FILED & ENTERED

MAY 16 2025

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY fortier DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

METROPOLITAN THEATRES
CORPORATION, a California corporation,

Debtor.

TAX ID.: 95-1002289

Case No. 2:24-bk-11569-BR

Chapter 11 (Subchapter V)

**ORDER GRANTING MOTION FOR
ENTRY OF AN ORDER
ESTABLISHING JUNE 13, 2025 AS THE
DEADLINE FOR FILING
ADMINISTRATIVE CLAIMS FOR (A)
EMPLOYEES AND (B) TAXING
AUTHORITIES**

[No Hearing Required Pursuant to Local
Bankruptcy Rule 9013-1(o)]

Upon the motion (the “Motion”) of Metropolitan Theatres Corporation, the reorganized debtor (“Debtor” or “MTC”) in the above-captioned Chapter 11, Subchapter V Bankruptcy Case for an Order establishing a bar date for filing requests for allowance of administrative claims described in 11 U.S.C. § 503(b) for (a) MTC’s employees who were employed between the

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ORDER GRANTING DEBTOR’S MOTION FOR AN ORDER ESTABLISHING JUNE 13, 2025 AS THE
DEADLINE FOR FILING ADMINISTRATIVE CLAIMS FOR (A) EMPLOYEES AND (B) TAXING
AUTHORITIES

1 bankruptcy petition date, February 29, 2024 (the “Petition Date”), and March 31, 2025, and (b)
2 taxing authorities who assert tax claims for the period between Petition Date and March 31, 2025
3 (the “Additional Potential Administrative Claims”) and procedures relating thereto; and upon the
4 record of this case; and the Court having determined that the relief requested in the Motion is in the
5 best interests of the Debtor, its estate, its creditors, and other parties-in-interest; and it appearing
6 that proper and adequate notice of the Motion has been given and no other further notice is
7 necessary; and after due deliberation thereon; and good and sufficient cause appearing therefore;

8 **IT IS HEREBY ORDERED THAT:**

9 1. The Motion is GRANTED as set forth herein.

10 2. MTC is authorized to resolve all Additional Potential Administrative Claims for (a)
11 MTC’s employees who were employed between the Petition Date and March 31, 2025, and (b)
12 taxing authorities who assert tax claims for the period between Petition Date and March 31, 2025
13 in accordance with the exclusive procedures set forth below, which are hereby approved and
14 authorized in their entirety:

15 a. The bar date for filing a motion for payment of an Additional Potential
16 Administrative Claim by (a) MTC’s employees who were employed by the Debtor between the
17 Petition Date and March 31, 2025, and (b) taxing authorities who assert tax claims for the period
18 between Petition Date and March 31, 2025, shall be **June 13, 2025** (the “Administrative Claims
19 Bar Date”);

20 b. The Administrative Claims Bar Date does not apply to any category of
21 claims for which claims bar dates have previously been established by order of the Court. The
22 Administrative Claims Bar Date therefore expressly excludes 503(b) administrative expense claims
23 of professionals and landlords.

24 c. A motion for payment of any Additional Potential Administrative Claim
25 must be filed with the Court on or before the Administrative Claims Bar Date and served upon (i)
26 counsel to MTC, Loeb & Loeb LLP, 10100 Santa Monica Blvd., Los Angeles, CA 90067, Attn:
27 Lance N. Jurich; and 345 Park Avenue, New York, NY, 10154, Attn: Vadim J. Rubinstein, (ii) the
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1 United States Trustee at Office of the United States Trustee for the Central District of California,
2 Los Angeles Division, 3801 University Avenue, Suite 720, Riverside, CA 92501 (Attn: Everett
3 Green and David Shevitz), (iii) all parties requesting special notice pursuant to Bankruptcy Rule
4 2002 and (iv) all parties entitled to receive electronic notice and service through the Court's ECF
5 system, and obtain a hearing date for such motion.

6 d. **Holders of Additional Potential Administrative Claims that are**
7 **required to file and serve a request for allowance and payment of such administrative claims**
8 **that do not file and serve such a request by the Administrative Claims Bar Date, unless such**
9 **date is extended by this Court, shall forever be barred, estopped, and enjoined from asserting**
10 **such Additional Potential Administrative Claims against the Debtor, the Debtor's**
11 **bankruptcy estate, MTC as reorganized, or their respective property, and such Additional**
12 **Potential Administrative Claims shall be deemed compromised, settled, and released as of the**
13 **effective date of the Plan, April 1, 2025.**

14 e. To the extent an Additional Potential Administrative Claim is determined to
15 be an allowed claim, such claim shall be paid pursuant to the Bankruptcy Code and the terms of the
16 *Second Modified First Amended Chapter 11 (Subchapter V) Plan of Reorganization* [Docket No.
17 382] confirmed pursuant to this Court's March 21, 2025 order [Docket No. 399].

18 f. The rights of MTC to assert any and all objections and defenses against
19 Additional Potential Administrative Claims, including but not limited to setoff, offset,
20 recharacterization, subordination (whether equitable, contractual, or otherwise), counterclaim,
21 cross-claim, defense, or any other challenge under the Bankruptcy Code or any other applicable
22 federal, state, or local law or regulation are expressly reserved.

23 3. MTC shall, promptly following the entry of this Order, transmit to all known taxing
24 authorities and employees who may assert an Additional Potential Administrative Claims a notice
25 in the form attached hereto as Exhibit A (the "Administrative Claims Bar Date Notice") setting
26 forth the Administrative Claims Bar Date and instructions for filing an Additional Potential
27 Administrative Claim.

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1 4. MTC is authorized and empowered to take such steps and perform such actions as
2 may be necessary to implement and effectuate the terms of this Order.

3 5. The terms and conditions of this Order shall be immediately effective and
4 enforceable upon its entry.

5 6. The court retains jurisdiction with respect to all matters arising from or related to
6 the implementation of this Order.

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24 Date: May 16, 2025



Barry Russell
United States Bankruptcy Judge

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EXHIBIT A

Administrative Claims Bar Date Notice

1 LOEB & LOEB LLP
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13 Telephone: 212.407.4000
14 Facsimile: 212.407.4990

15 Attorneys for Reorganized Debtor
16 METROPOLITAN THEATRES CORPORATION, a
17 California corporation

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12 **UNITED STATES BANKRUPTCY COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

14 In re:
15 METROPOLITAN THEATRES
16 CORPORATION, a California corporation,
17 Debtor.
18 TAX ID.: 95-1002289

Case No. 2:24-bk-11569-BR

Chapter 11 (Subchapter V)

**NOTICE OF JUNE 13, 2025 BAR DATE
FOR FILING ADMINISTRATIVE
CLAIMS FOR (A) EMPLOYEES AND
(B) TAXING AUTHORITIES**

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22 **TO: ALL HOLDERS OF CLAIMS, EQUITY INTERESTS,**
23 **AND OTHER PARTIES IN INTEREST:**
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1 **PLEASE TAKE NOTICE** that, on February 11, 2025, Metropolitan Theatres Corporation,
2 the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11, subchapter
3 V bankruptcy case (the “Bankruptcy Case”), filed its *Second Modified First Amended Chapter 11*
4 (*Subchapter V*) *Plan of Reorganization* [Docket No. 382] (the “Plan”).¹

5 **PLEASE TAKE FURTHER NOTICE** that, the Bankruptcy Court entered its *Order*
6 *Confirming the Debtor’s Second Modified First Amended Chapter 11 (Subchapter V) Plan of*
7 *Reorganization* [Docket No. 399] and the Plan became effective on April 1, 2025.

8 **PLEASE TAKE FURTHER NOTICE** that, the Bankruptcy Court entered its *Order*
9 *Establishing June 13, 2025 as The Deadline for Filing Administrative Claims for (A) Employees*
10 *and (B) Taxing Authorities* on May __, 2025 [Docket No. __] (the “Admin Bar Date Order”).

11 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Admin Bar Date Order, the
12 Bankruptcy Court has established **June 13, 2025** (the “Administrative Claims Bar Date”) as the
13 last day for filing requests for allowance of administrative claims described in 11 U.S.C. § 503(b)
14 for (a) MTC’s employees who were employed between the bankruptcy petition date, February 29,
15 2024 (the “Petition Date”) and March 31, 2025, and (b) taxing authorities who assert tax claims for
16 the period between the Petition Date and March 31, 2025 (the “Additional Potential Administrative
17 Claims”).

18 **PLEASE TAKE FURTHER NOTICE** that, the Administrative Claims Bar Date does not
19 apply to any category of claims for which claims bar dates have previously been established by
20 order of the Court. The Administrative Claims Bar Date therefore expressly excludes
21 administrative claims under section 503(b) of the Bankruptcy Code of professionals and landlords.
22 Only Additional Potential Administrative Claims must be filed and served on or before the
23 Administrative Claims Bar Date.

24 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Admin Bar Date Order, any
25 party filing a request for payment of Additional Potential Administrative Claims must obtain a
26 hearing date with the Court and file its request for payment with the Bankruptcy Court no later than
27 _____

28 ¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan.

1 the **June 13, 2025** Administrative Claims Bar Date and serve such motion upon the following
2 parties so as to be received on or before the Administrative Claims Bar Date: (i) MTC, through its
3 counsel, Loeb & Loeb LLP, 10100 Santa Monica Blvd., Los Angeles, CA 90067, Attn: Lance N.
4 Jurich; and 345 Park Avenue, New York, NY, 10154, Attn: Vadim J. Rubinstein; and (ii) the Office
5 of the United States Trustee for the Central District of California, Los Angeles Division, 3801
6 University Avenue, Suite 720, Riverside, CA 92501 (Attn: Everett Green and David Shevitz) (the
7 “Notice Parties”).

8 **PLEASE TAKE FURTHER NOTICE that, pursuant to the Admin Claims Bar Order,**
9 **holders of Additional Potential Administrative Claims that are required to file and serve a**
10 **request for allowance and payment of such Additional Potential Administrative Claims that**
11 **do not file and serve such a request by the Administrative Claims Bar Date of June 13, 2025,**
12 **unless such date is extended by the Bankruptcy Court, shall forever be barred, estopped, and**
13 **enjoined from asserting such Additional Potential Administrative Claims against the Debtor,**
14 **the Debtor’s bankruptcy estate, MTC as reorganized, or their respective property, and such**
15 **Additional Potential Administrative Claims shall be deemed compromised, settled, and**
16 **released as of the effective date of the Plan, April 1, 2025.**

17 **PLEASE TAKE FURTHER NOTICE,** the Admin Claim Bar Date Order and the Plan
18 are each on file with the Clerk of the Bankruptcy Court. Copies of the Admin Claim Bar Date
19 Order, the Plan, and all other documents filed in or related to the Debtor’s Bankruptcy Case may
20 be obtained free of charge at <https://www.donlinrecano.com/Clients/mtc/Index>.

21 Dated: [May ____], 2025

LOEB & LOEB LLP
LANCE JURICH
VADIM J. RUBINSTEIN

23
24 By: /s/ Vadim J. Rubinstein
Vadim J. Rubinstein (*pro hac vice*)

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26 Attorneys for METROPOLITAN THEATRES
CORPORATION