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

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**UNITED STATES BANKRUPTCY COURT**

**FOR THE CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

15 In re:  
16 METROPOLITAN THEATRES  
17 CORPORATION, a California  
18 corporation,  
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Debtor.

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

Chapter 11 (Subchapter V)

**NOTICE OF HEARING TO  
CONSIDER CONFIRMATION**

Hearing:

Date: October 1, 2024

Time: 10:00 a.m.

Courtroom: Courtroom 1668

255 East Temple St.  
Los Angeles, CA 90012

TAX ID.: 95-1002289

**TO: ALL HOLDERS OF CLAIMS, EQUITY INTERESTS,  
AND OTHER PARTIES IN INTEREST:**

1           **NOTICE IS HEREBY GIVE THAT:**

2           1.       Metropolitan Theatres Corporation, the Chapter 11 Debtor and debtor-in-possession  
3           (“MTC” or the “Debtor”), in the pending above-captioned Chapter 11, subchapter V case (the  
4           “Case”), commenced this Case by filing a voluntary petition for relief under Chapter 11 of the  
5           Bankruptcy Code on February 29, 2024 (the “Petition Date”). Additional factual background  
6           regarding the Debtor, including its business operations, capital and debt structures, and the events  
7           leading to the filing of the Case, is set forth in detail in the Declaration of David Corwin, President  
8           of Metropolitan Theatres Corporation, in Support of Chapter 11 Petition Subchapter V Petition and  
9           First Day Motions [Docket No. 2], which is fully incorporated in this notice by reference.  
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11           2.       On August 20, 2024, the Debtor filed its *First Amended Chapter 11 (Subchapter V)*  
12           *Plan of Reorganization* [Docket No. 263] (as may be amended, supplemented, or otherwise  
13           modified from time to time, the “Plan”). A copy of the Plan is included with this Notice.<sup>1</sup> **The**  
14           **following notice contains important deadlines for creditors to indicate whether they support**  
15           **or oppose the terms of the Debtor’s Plan and the deadlines established by the Court to object**  
16           **to confirmation of the Plan.**  
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18           3.       **Confirmation Hearing Date:** The Court will hold the hearing on confirmation of  
19           the Debtor’s Plan (“Confirmation Hearing”) on **October 1, 2024 at 10:00 a.m. PT**, or as soon  
20           thereafter as counsel can be heard. The Confirmation Hearing may be adjourned from time to time  
21           without further notice to creditors other than by an announcement in Court of such adjournment.  
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23           4.       **Ballot.** Not all creditors or parties in interest will receive a Ballot for voting on the  
24           Plan. Only creditors whose claims are impaired will receive a Ballot. General unsecured creditors  
25           of the Debtor who are in Class 4 are impaired and Class 4 is the only class of Claims that may vote.  
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27           <sup>1</sup> Capitalized terms not otherwise defined in this notice shall have the meaning ascribed to them in  
28           the Plan

1           5.       **Ballot Instructions:** If you received a Ballot and intend to vote on the Plan you must:  
2 (a) follow the instructions on the Ballot carefully; (b) complete all of the required information on  
3 the Ballot; and (c) execute and return your completed Ballot to Donlin, Recano, & Company, Inc.,  
4 the Debtor's Voting and Claims Agent (the "Voting and Claims Agent") by mail or via the Voting  
5 and Claims Agent's balloting portal, as indicated in the instructions on the Ballot.  
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7           6.       **Voting Deadline:** Only general unsecured creditors of the Debtor, all of whom are  
8 in Class 4 under the Plan, are entitled to vote to accept or reject the Plan. The deadline for voting  
9 on the Plan is **September 17, 2024** ("Voting Deadline"). Ballots must **actually be received** by the  
10 Debtor's Voting and Claims Agent on or before the Voting Deadline in accordance with the  
11 instructions appended to the Ballot. Failure to submit your Ballot by the Voting Deadline may result  
12 in the disqualification of your Ballot and your vote.  
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14           7.       **Objections to Confirmation:** The deadline for filing an objection to confirmation  
15 of the Plan ("Objection") is **September 17, 2024** (the "Plan Objection Deadline"). In order to be  
16 considered by the Bankruptcy Court, Objections, if any, to the Plan, must (a) be in writing, (b) state  
17 the name and address of the objecting party and the amount and nature of the Claim or Interest of  
18 such party, (c) state with particularity the basis and nature of any objection or proposed modification,  
19 and (d) be filed with the Court and served so that they are actually received on or before the Plan  
20 Objection Deadline by (the foregoing, the "Objection Notice Parties"): (i) the Debtor, through its  
21 proposed counsel, Loeb & Loeb LLP, 10100 Santa Monica Blvd., Los Angeles, CA 90067, Attn:  
22 Lance N. Jurich; and 345 Park Avenue, New York, NY, Attn: Vadim J. Rubinstein; (ii) the  
23 Subchapter V Trustee, M. Douglas Flahaut, Esq., Subchapter V Trustee, 555 W. Fifth Street, 48th  
24 Floor, Los Angeles, CA 90026; and (iii) the Office of the United States Trustee for the Central  
25 District of California, Los Angeles Division, 3801 University Avenue, Suite 720, Riverside, CA  
26 92501 (Attn: Everett Green and David Shevitz).  
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1           8.       **Reply to an Objection:** Any reply to an Objection shall be filed and served by  
2       **September 24, 2024.**

3           9.       **Assumption of Executory Contracts and Unexpired Leases.** The Plan provides  
4       for the assumption of the Debtor's executory contracts and unexpired leases (the "Contracts")  
5       scheduled on Exhibit C to the Plan, pursuant to sections 365 and 1123 of the Bankruptcy Code,  
6       unless any such Contract: (1) was assumed or rejected previously by the Debtor; (2) expired or  
7       terminated pursuant to its own terms before the Effective Date; or (3) is subject to a specific  
8       agreement between the Debtor and the counterparty to the Contract.

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10          10.       **Assumption Objection Deadline.** All known counterparties to the Contracts have  
11       been served a notice (the "Cure Notice") of the amount necessary to cure any defaults in connection  
12       with the Debtor's potential assumption of such Contracts on or about August 20, 2024. On or before  
13       September 10, 2024, the Debtor shall file a list of Contracts that it intends to assume, subject to  
14       agreement with the counterparty regarding the appropriate cure amount should it object to  
15       assumption. Objections to the Cure Notice and the Debtor's intent to assume any listed Contract  
16       ("Assumption Objection") shall be filed and served so as to be received by the Objection Notice  
17       Parties by **September 17, 2024.**

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19          11.       **Reply to Assumption Objection.** Any reply to an Assumption Objection shall be  
20       filed and served by **September 24, 2024.**

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22          12.       **Directions to Obtain the Plan.** If you have not received a copy of the Plan and wish  
23       to obtain a copy of the same, you may obtain it from the Debtor's dedicated website at:  
24       <https://www.donlinrecano.com/Clients/mtc/Index>.

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26       **YOU ARE ADVISED TO CAREFULLY REVIEW AND CONSIDER THE**  
27       **PLAN, AS YOUR RIGHTS MIGHT BE AFFECTED.**  
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Dated: August 20, 2024

LOEB & LOEB LLP  
LANCE JURICH  
VADIM J. RUBINSTEIN

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

Attorneys for Debtor  
METROPOLITAN THEATRES  
CORPORATION