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Attorneys for Debtor
METROPOLITAN THEATRES CORPORATION, a
California corporation

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)

**NOTICE OF (I) THE OCCURRENCE OF
THE EFFECTIVE DATE WITH
RESPECT TO THE PLAN; (II)
SUBSTANTIAL CONSUMMATION OF
THE PLAN; (III) BAR DATE FOR
REJECTION DAMAGES CLAIMS; (IV)
BAR DATE FOR UNAPPROVED
PROFESSIONAL FEE
ADMINISTRATIVE CLAIMS; AND (V)
BAR DATE FOR ADMINISTRATIVE
RENT CLAIMS**

Confirmation Hearing

Date: March 4, 2025
Time: 10:00 AM PT
Ctrm: Courtroom 1668
Edward R. Roybal Building
and Courthouse
255 East Temple Street
Los Angeles, CA 90012

1
2 **TO: ALL HOLDERS OF CLAIMS, EQUITY INTERESTS,**
3 **AND OTHER PARTIES IN INTEREST:**

4 **PLEASE TAKE NOTICE** that, on February 11, 2025, Metropolitan Theatres Corporation,
5 the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11, subchapter
6 V bankruptcy case (the “Bankruptcy Case”), filed its *Second Modified First Amended Chapter 11*
7 *(Subchapter V) Plan of Reorganization* [Docket No. 382] (the “Plan”).¹

8 **PLEASE TAKE FURTHER NOTICE** that, on March 4, 2025 at 10:00 a.m. (prevailing
9 Pacific Time), the United States Bankruptcy Court for the Central District of California (the
10 “Bankruptcy Court”) held a hearing (the “Confirmation Hearing”) to consider confirmation of the
11 Plan in the Bankruptcy Case.

12 **PLEASE TAKE FURTHER NOTICE** that, at the Confirmation Hearing, the Bankruptcy
13 Court confirmed the Plan, subject to satisfaction of certain conditions (the “Confirmation
14 Conditions”).

15 **PLEASE TAKE FURTHER NOTICE** that, the Bankruptcy Court entered the *Order*
16 *Confirming the Debtor’s Second Modified First Amended Chapter 11 (Subchapter V) Plan of*
17 *Reorganization* [Docket No. 399] (the “Confirmation Order”) on March 21, 2025, after the Debtor
18 satisfied the Confirmation Conditions.

19 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Confirmation Order, the
20 Bankruptcy Court has approved certain discharges, releases, exculpations, and injunctions, as set
21 forth in detail in Article XVI of the Plan, all of which are binding on holders of Claims and Interests
22 against the Debtor.

23 **PLEASE TAKE FURTHER NOTICE** that, the Debtor has paid all Cure Claims and
24 previously Allowed Administrative Claims that were required to be paid as a condition of the
25 occurrence of the Effective Date and thus the **EFFECTIVE DATE OCCURRED ON APRIL 1,**
26 **2025.**

27 **PLEASE TAKE FURTHER NOTICE** that, the Plan has been substantially consummated.

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

1 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Confirmation Order, any
2 requests for payment of Professional Fee Claims that have not already been approved must be filed
3 with the Bankruptcy Court no later than **May 1, 2025** (“Professional Fees Bar Date”) and be served
4 upon the following parties so as to be received on or before the Professional Fees Bar Date: (i) the
5 Debtor, through its counsel, Loeb & Loeb LLP, 10100 Santa Monica Blvd., Los Angeles, CA
6 90067, Attn: Lance N. Jurich; and 345 Park Avenue, New York, NY, 10154, Attn: Vadim J.
7 Rubinstein; (ii) the Subchapter V Trustee, M. Douglas Flahaut, Esq., Subchapter V Trustee, Echo
8 Park Legal, APC, 210 W. Sunset Blvd. #301, Los Angeles, CA 90026; and (iii) the Office of the
9 United States Trustee for the Central District of California, Los Angeles Division, 3801 University
10 Avenue, Suite 720, Riverside, CA 92501 (Attn: Everett Green and David Shevitz) (the “Notice
11 Parties”).

12 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Confirmation Order, requests
13 for payment of an Administrative Rent Claim (as defined in the Confirmation Order) that is not
14 otherwise provided for under Section 9.2 of the Plan (or any other provision thereof) must be filed
15 with the Bankruptcy Court no later than **May 1, 2025** (“Administrative Rent Bar Date”) and be
16 served upon the Notice Parties so as to be received on or before the Administrative Rent Bar Date.

17 **PLEASE TAKE FURTHER NOTICE that, pursuant to the Confirmation Order,**
18 **holders of Professional Fee Claims and Administrative Rent Claims that are required to file**
19 **and serve a request for allowance and payment of such Administrative Claims that do not file**
20 **and serve such a request by the Professional Fees Bar Date or Administrative Rent Bar Date,**
21 **as applicable, unless such date is extended by the Bankruptcy Court, shall forever be barred,**
22 **estopped, and enjoined from asserting such Administrative Claims against the Debtor, the**
23 **Debtor’s bankruptcy estate, Reorganized MTC, or their respective property, and such**
24 **Administrative Claims shall be deemed compromised, settled, and released as of the Effective**
25 **Date.**

26 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Confirmation Order, the
27 Debtor’s executory contracts and unexpired leases set forth on Exhibit C to the Plan were assumed
28 pursuant to sections 365(a) and 1123 of the Bankruptcy Code on the Effective Date, as further

provided in Article XII of the Plan, and all other executory contracts and unexpired leases not previously assumed, including those appearing on Exhibit C-2 to the Plan Supplement, were rejected as of the Effective Date.

PLEASE TAKE FURTHER NOTICE that, any holder of a Claim arising from the rejection of an executory contract or unexpired lease pursuant to the Plan must either (a) file a Proof of Claim on account of such rejection damages Claim with the Bankruptcy Court or (b) submit a Proof of Claim on account of such rejection damages Claim by no later than **May 1, 2025** (the “Rejection Damages Bar Date”) to the Claims and Noticing Agent at the following address:

If by Regular Mail:

Donlin, Recano & Company, Inc.
Re: Metropolitan Theatres Corp.
P.O. Box 2053
New York, NY 10272-2042

If by Messenger or Overnight Delivery:

Donlin, Recano & Company, Inc. c/o Equiniti
Re: Metropolitan Theatres Corp.
48 Wall Street 22nd Floor
New York, NY 10005

ANY CLAIMS ARISING FROM REJECTION OF AN EXECUTORY CONTRACT OR UNEXPIRED LEASE NOT FILED ON OR BEFORE THE REJECTION DAMAGES BAR DATE SHALL BE DISALLOWED PURSUANT TO THE CONFIRMATION ORDER, FOREVER BARRED FROM ASSERTION, AND SHALL NOT BE ENFORCEABLE AGAINST, AS APPLICABLE, THE DEBTOR, REORGANIZED MTC, THE DEBTOR’S ESTATE, OR PROPERTY OF THE FOREGOING PARTIES, WITHOUT THE NEED FOR ANY OBJECTION BY THE DEBTOR OR REORGANIZED MTC, AS APPLICABLE, OR FURTHER NOTICE TO, OR ACTION, ORDER, OR APPROVAL OF THE BANKRUPTCY COURT OR ANY OTHER ENTITY, AND ANY CLAIM ARISING OUT OF THE REJECTION OF SUCH EXECUTORY CONTRACT OR UNEXPIRED LEASE SHALL BE DEEMED FULLY SATISFIED, RELEASED, AND DISCHARGED, NOTWITHSTANDING ANYTHING IN THE SCHEDULES, IF ANY, OR A PROOF OF CLAIM TO THE CONTRARY.

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

1 Dated: April 1, 2025

LOEB & LOEB LLP
LANCE JURICH
VADIM J. RUBINSTEIN

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

7 Attorneys for Debtor
8 METROPOLITAN THEATRES
9 CORPORATION