

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
OPEN ROAD FILMS, LLC, a Delaware limited liability company, <i>et al.</i> , <sup>1</sup>	)	Case No. 18-12012 (LSS)
	)	
Debtors.	)	Joint Administration Requested
	)	

---

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Bank of America, N.A. ("Bank of America") hereby appears in the above-captioned cases through its counsel, Paul Hastings LLP and Ashby & Geddes, P.A., and pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§ 102(1), 342 and 1109(b), requests that all notices given or required to be given in these cases be given and served upon:

<p><b>PAUL HASTINGS LLP</b>                  Andrew V. Tenzer, Esq.                  Shlomo Maza, Esq.                  75 East 55th Street                  New York, NY 10022                  Telephone: (212) 318-6000                  Fax: (212) 319-4090                  Email: andrewtenzer@paulhastings.com                  Email: shlomomaza@paulhastings.com</p>	<p><b>ASHBY &amp; GEDDES, P.A.</b>                  William P. Bowden, Esq.                  500 Delaware Avenue, 8th Floor                  P.O. Box 1150                  Wilmington, DE 19899-1150                  Telephone: (302) 654-1888                  Facsimile: (302) 654-2067                  Email: wbowden@ashbygeddes.com</p>
---	---

**PLEASE TAKE FURTHER NOTICE** that this request for notice and service includes copies of all papers, including, but not limited to, reports, pleadings, motions, and answering or reply papers filed in these cases and that such service be by mailing one copy of each, unless otherwise directed by the Court, to the parties listed above.

**PLEASE TAKE FURTHER NOTICE** that Bank of America intends that neither this

---

<sup>1</sup> The Debtors and the last four digits of their respective federal taxpayer identification numbers are as follows: Open Road Films, LLC (4435-Del.); Open Road Releasing, LLC (4736-Del.); OR Productions LLC (5873-Del.); Briarcliff LLC (7304-Del.); Open Road International LLC (4109-Del.); and Empire Productions LLC (9375-Del.). The Debtors' address is 2049 Century Park East, 4th Floor, Los Angeles, CA 90067.

Notice of Appearance nor any former or later pleading, claim or suit shall waive (1) the right to have final orders in non-core matters entered only after de novo review by the United States District Court for the District of Delaware (the "District Court"), (2) the right to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal or (4) any other rights, claims, actions, defenses, set-offs, or recoupments to which Bank of America is or may be entitled under agreements in law or in equity.

Dated: September 6, 2018

**ASHBY & GEDDES, P.A.**

/s/ William P. Bowden

William P. Bowden, Esq. (#2553)  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, Delaware 19899-1150  
Telephone: (302) 654-1888  
Fax: (302) 654-2067  
Email: wbowden@ashbygeddes.com

-and-

**PAUL HASTINGS LLP**

Andrew V. Tenzer, Esq.  
Shlomo Maza, Esq.  
75 East 55th Street  
New York, NY 10022  
Telephone: (212) 318-6000  
Fax: (212) 319-4090  
Email: andrewtenzer@paulhastings.com  
Email: shlomomaza@paulhastings.com

*Counsel to Bank of America, N.A.*