

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

In re:) Chapter 11
OPEN ROAD FILMS, LLC, *et al.*)
)
Debtors.) Case No. 18-12012 (LSS)
) (Jointly Administered)

**VERIFIED STATEMENT OF BUSH GOTTLIEB AND
LAW OFFICE OF SUSAN E. KAUFMAN, LLC PURSUANT
TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, the law firms of Bush Gottlieb, a Law Corporation and Law Office of Susan E. Kaufman, LLC give notice of representation of more than one creditor in the above-captioned bankruptcy cases, and state as follows:

1. Bush Gottlieb and Law Office of Susan E. Kaufman, LLC represent the following creditors (hereinafter the “Union Entities”):

Directors Guild of America, Inc.
7920 Sunset Boulevard
Los Angeles, CA 90046
(310) 289-2000

Screen Actors Guild – American Federation of Television and Radio Artists
5757 Wilshire Boulevard
Los Angeles, CA 90036
(323) 954-1600

Writers Guild of America, West, Inc.
7000 West Third Street
Los Angeles, CA 90048
(323) 951-4000

Directors Guild of America, Inc-Producer Pension and Health Plans
5055 Wilshire Blvd., Ste. 600
Los Angeles, CA 90036
(323) 866-2255

Motion Picture Industry Pension and Health Plans
11365 Ventura Boulevard
Studio City, CA 91604
(818) 769-0007

Screen Actors Guild-Producers Pension & Health Plans
3601 West Olive Avenue, 2nd Floor
Burbank, CA 91510-7830
(818) 973-4444

Writers Guild Pension Plan and Industry Health Fund
1015 North Hollywood Way
Burbank, CA 91505
(818) 846-1015

2. The Union Entities are unable to estimate liquidated claims, but look forward to working productively with the Debtors, their counsel and other professionals to obtain the information necessary to calculate their claims. Further, note that significant film rights held by the Debtors are subject to prior and senior encumbrances in favor of one or more Union Entities.

3. Bush Gottlieb is the long-standing outside counsel to the Union Entities in connection with insolvency and collection matters and Susan E. Kaufman of Law Office of Susan E. Kaufman, LLC has previously worked with Bush Gottlieb on Delaware bankruptcy matters.

4. Upon information and belief, Bush Gottlieb and Law Office of Susan E. Kaufman, LLC have no claims or interest against the Debtors.

Date: September 7, 2018

LAW OFFICE OF SUSAN E. KAUFMAN, LLC

/s/ Susan E. Kaufman

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Attorneys for the Union Entities