

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re

OPEN ROAD FILMS, LLC, a Delaware  
limited liability company, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 18-12012 (LSS)

(Jointly Administered)

**Bid Procedures Hearing Date:**  
**October 2, 2018 at 2:00 p.m. (ET)**

**Bid Procedures Objection Deadline:**  
**September 25, 2018 at 4:00 p.m. (ET)**

**Ref. Docket No. 9**

**NOTICE OF MOTION**

TO: (A) THE U.S. TRUSTEE; (B) COUNSEL TO THE AGENT; (C) HOLDERS OF THE FORTY (40) LARGEST UNSECURED CLAIMS ON A CONSOLIDATED BASIS AGAINST THE DEBTORS; AND (D) ALL PARTIES THAT, AS OF THE FILING OF THIS NOTICE, HAVE REQUESTED NOTICE PURSUANT TO BANKRUPTCY RULE 2002

**PLEASE TAKE NOTICE** that, on September 6, 2018, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Motion for Orders: (A) (I) Establishing Bid and Sale Procedures Relating to the Sale of Substantially All of the Debtors’ Assets, (II) Authorizing the Debtors to Enter Into an Asset Purchase Agreement With Stalking Horse Bidder, (III) Establishing and Approving Procedures Relating to the Assumption, Assignment and Sale of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts and (IV) Scheduling a Hearing to Consider the Proposed Sale and (B)(I) Approving the Sale of Substantially All of the Debtors’ Assets, (II) Authorizing the Assumption, Assignment and Sale of Certain Executory Contracts and Unexpired Leases, and (III) Granting Certain Related Relief* [Docket No. 9] (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion as it pertains to the Debtors’ request for the entry of the Bid Procedures Order (as defined in the Motion) must be filed on or before **September 25, 2018 at 4:00 p.m. (ET)** (the “Objection”).

<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.

Deadline”) with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned proposed counsel to the Debtors so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION AS IT PERTAINS TO THE DEBTORS’ REQUEST FOR ENTRY OF THE BID PROCEDURES ORDER WILL BE HELD ON OCTOBER 2, 2018 AT 2:00 P.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6<sup>th</sup> FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION AS IT PERTAINS TO THE DEBTORS’ REQUEST FOR ENTRY OF THE BID PROCEDURES ORDER WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: September 7, 2018

*/s/ Robert F. Poppiti, Jr.*

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*Proposed Counsel to Debtors and  
Debtors in Possession*