

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re

OPEN ROAD FILMS, LLC, a Delaware
limited liability company, *et al.*,¹

Debtors.

Chapter 11

Case No.: 18-12012 (LSS)

(Jointly Administered)

Hearing Date:

October 2, 2018 at 2:00 p.m. (ET)

Objection Deadline:

September 25, 2018 at 4:00 p.m. (ET)

Ref. Docket Nos. 4 and 41

**NOTICE OF FINAL HEARING AND ENTRY OF INTERIM ORDER (I)
AUTHORIZING PAYMENT OF LIMITED PREPETITION EMPLOYEE BENEFITS
AND CONFIRMING RIGHT TO CONTINUE EMPLOYEE BENEFITS ON
POSTPETITION BASIS, (II) AUTHORIZING PAYMENT OF REIMBURSEMENT FOR
PREPETITION EXPENSES, (III) AUTHORIZING PAYMENT OF WITHHOLDING
AND PAYROLL-RELATED TAXES, AND (IV) AUTHORIZING BANKS TO HONOR
PREPETITION CHECKS AND FUND TRANSFERS FOR AUTHORIZED PAYMENTS**

TO: (I) THE U.S. TRUSTEE; (II) HOLDERS OF THE FORTY (40) LARGEST
UNSECURED CLAIMS ON A CONSOLIDATED BASIS AGAINST THE DEBTORS;
(III) THE AGENT; (IV) THE OFFICE OF THE UNITED STATES ATTORNEY FOR
THE DISTRICT OF DELAWARE; (V) THE INTERNAL REVENUE SERVICE; (VI)
THE BANKS; AND (VII) ALL PARTIES WHO HAVE FILED A NOTICE OF
APPEARANCE AND REQUEST FOR SERVICE OF PAPERS 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
Entry of Interim and Final Orders (I) Authorizing Payment of Limited Prepetition Employee
Benefits and Confirming Right to Continue Employee Benefits on Postpetition Basis,
(II) Authorizing Payment of Reimbursement for Prepetition Expenses, (III) Authorizing
Payment of Withholding and Payroll-Related Taxes, (IV) Authorizing Banks to Honor
Prepetition Checks and Fund Transfers for Authorized Payments, and (V) Scheduling Final
Hearing* [Docket No. 4] (the “Motion”), a copy of which is attached hereto as Exhibit 1. On

¹ 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.

September 7, 2018, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order [Docket No. 41] (the “Interim Order”), a copy of which is attached hereto as Exhibit 2,² approving the Motion on an interim basis.

PLEASE TAKE FURTHER NOTICE that any objections to entry of a final order approving the Motion must be filed on or before **September 25, 2018 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon (i) proposed counsel to the Debtors, (a) Klee, Tuchin, Bogdanoff & Stern LLP, 1999 Avenue of the Stars, 39th Floor, Los Angeles, California 90067, Attn: Michael L. Tuchin, Esq. and Jonathan M. Weiss, Esq., and (b) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Michael R. Nestor, Esq. and Robert F. Poppiti, Jr. Esq.; (ii) counsel to the Agent, Paul Hastings LLP (a) 1999 Avenue of the Stars, 27th Floor, Los Angeles, California 90067, Attn: Susan Williams and (b) 200 Park Avenue, New York, New York 10166, Attn: Andrew V. Tenzer; (iii) counsel to any statutory committee appointed in these chapter 11 Cases; and (iv) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Richenderfer, Esq. A copy of the Proposed Final Order is attached to the Motion as Exhibit B.

PLEASE TAKE FURTHER NOTICE THAT A FINAL HEARING ON THE MOTION WILL BE HELD ON OCTOBER 2, 2018 AT 2:00 P.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH 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 ON A FINAL BASIS WITHOUT FURTHER NOTICE OR A HEARING.

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Interim Order.

Dated: September 7, 2018

/s/ Robert F. Poppiti, Jr.

Michael R. Nestor, Esq. (Bar No. 3526)
Robert F. Poppiti, Jr., Esq. (Bar No. 5052)
Ian J. Bambrick, Esq. (Bar No. 5455)
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Tel: (302) 571-6600
Fax: (302) 571-1253

and

Michael L. Tuchin, Esq.
Jonathan M. Weiss, Esq.
Sasha M. Gurvitz, Esq.
KLEE, TUCHIN, BOGDANOFF & STERN LLP
1999 Avenue of the Stars, 39th Floor
Los Angeles, CA 90067
Tel: (310) 407-4000
Fax: (310) 407-9090

*Proposed Counsel to Debtors and
Debtors in Possession*