## 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)

Hearing Date: October 2, 2018, at 2:00 p.m. (ET) Objection Deadline: September 25, 2018, at 4:00 p.m. (ET)

## **NOTICE OF APPLICATION**

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; AND (IV) ALL PARTIES WHO HAVE FILED A NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT TO BANKRUPTCY RULE 2002

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") have filed the attached *Debtors' Application for an Order Authorizing the Employment and Retention of Donlin, Recano & Company, Inc., as Administrative Agent to the Debtors*, Nunc Pro Tunc to the Petition Date (the "Application").

PLEASE TAKE FURTHER NOTICE that any objections to the Application must be filed on or before <u>September 25, 2018, at 4:00 p.m. (ET)</u> (the "<u>Objection Deadline</u>") 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 APPLICATION WILL BE HELD ON <u>OCTOBER 2, 2018, AT 2:00 P.M. (ET)</u> 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.

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.

## PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THEN COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: September 11, 2018

## /s/ Ian J. Bambrick

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, 39<sup>th</sup> Floor
Los Angeles, CA 90067

Tel: (310) 407-4000 Fax: (310) 407-9090

Proposed Counsel to Debtors and Debtors in Possession