

**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)

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON OCTOBER 9, 2018 AT 2:00 P.M. (ET)**

**CONTESTED MATTER GOING FORWARD**

1. 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 [D.I. 9, 9/6/18]<sup>2</sup>

Response Deadline:

September 25, 2018 at 4:00 p.m. (ET)  
[Extended until September 27, 2018 at 4:00  
p.m. (ET) for the Office of the United States  
Trustee; Extended until September 27, 2018  
at 1:00 p.m. (ET) for Endgame Releasing  
Co., LLC and Endgame Releasing Funding,  
LLC; and Extended until October 1, 2018 at  
2:00 p.m. (ET) for the Official Committee of  
Unsecured Creditors]

Responses Received:

- A. Informal comments from the Office of the United States Trustee

<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.

<sup>2</sup> This matter was adjourned until October 9, 2018 at 2:00 p.m. (ET) as set forth on the record at the October 2, 2018 hearing.

- B. Informal objection from the Official Committee of Unsecured Creditors
- C. Response and Reservation of Rights of Endgame Releasing Co., LLC and Endgame Releasing Funding, LLC [D.I. 102, 9/27/18] (together, “Endgame”)
- D. Informal comments from the Directors Guild of America, Inc., et al. and their Respective Pension and Health Plans (collectively, the “Union Entities”)

Related Documents:

- E. Notice of Motion [D.I. 50, 9/7/18]
- F. Notice of Filing of (I) Proposed Sale Order and (II) Proposed Form APA [D.I. 124, 10/1/18]

Status: Item A and B have been resolved, and the Debtors are continuing to negotiate with Endgame and the Union Entities to reach a consensual resolution on the outstanding issues raised by each. To the extent that the Debtors enter into an asset purchase agreement with a stalking horse bidder prior to the hearing, the Debtors intend to file that asset purchase agreement with the Court and provide notice thereof. This matter is going forward.

Dated: October 4, 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

*Counsel to Debtors and Debtors in Possession*