

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)

Requested Hearing Date:
October 25, 2018

Requested Objection Deadline:
At the commencement of the hearing

NOTICE OF MOTION

TO: (I) THE U.S. TRUSTEE; (II) PROPOSED COUNSEL TO THE COMMITTEE;
(III) THE AGENT; (IV) ALL OTHER PARTIES WHO WERE SERVED WITH THE
BID PROCEDURES MOTION; AND (V) ALL PARTIES WHO, AS OF THE FILING
OF THE MOTION, HAVE FILED A NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS IN THESE CASES PURSUANT TO BANKRUPTCY
RULE 2002

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in
possession (collectively, the “Debtors”) have filed the attached *Debtors’ Motion for Entry of an
Order Authorizing and Approving Certain Bidding Protections and Amendments to Bid
Procedures Order, and Granting Related Relief* (the “Bidding Protections Motion”).

PLEASE TAKE FURTHER NOTICE that, contemporaneously with the filing
of the Bidding Protections Motion, the Debtors have also filed a motion (the “Motion to
Shorten”) requesting that any objections to the relief requested in the Bidding Protections Motion
be due at the commencement of the hearing.

**PLEASE TAKE FURTHER NOTICE THAT, PURSUANT TO THE
MOTION TO SHORTEN, THE DEBTORS HAVE REQUESTED THAT A HEARING TO
CONSIDER THE BIDDING PROTECTIONS MOTION BE HELD ON OCTOBER 25, 2018
BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, IN THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET,
6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.**

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.

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

Dated: October 23, 2018

/s/ Robert F. Poppiti, Jr.

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