

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re

OPEN ROAD FILMS, LLC, *et al.*,

Debtors.

Chapter 11

Case Nos. 18-12012 (LSS), *et seq.*
(Jointly Administered)

Hearing Date: November 9, 2018, 10:00 A.M.
Objections due by: November 2, 2018, 4:00 P.M.

NOTICE OF MOTION

TO: All parties listed on the Certificate of Service.

Redrover Co. Ltd. (“Movant”) has filed the attached Motion For Entry Of An Order Compelling Assumption Or Rejection Of Executory Contracts, Adequate Protection, And Related Relief (the “Motion”), which seeks the following relief: Entry of an order directing that the Debtor’s executory contracts with Movant be rejected automatically within 28 days after entry of the order, except to the extension the Debtor files a motion to assume them and tenders the full cure amount in cash, and related relief regarding rejection of subdistribution agreements, adequate protection, modification of the existing order authorizing the Debtors’ use of cash collateral, and relief from the automatic stay.

A HEARING ON THE MOTION WILL BE HELD ON NOVEMBER 9, 2018 AT 10:00 A.M. PREVAILING EASTERN TIME.

You are required to file a response to the Motion on or before November 2, 2018 at 4:00 p.m. Prevailing Eastern Time. At the same time, you must also serve a copy of the response upon the following persons:

Adam Hiller, Esquire
Hiller Law, LLC
1500 North French Street, 2nd Floor
Wilmington, DE 19801
ahiller@AdamHillerLaw.com

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE,
THE RELIEF REQUESTED IN THE MOTION MAY BE GRANTED BY THE
COURT WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 23, 2018
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

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Attorney for Movant