

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re:)	Chapter 11
)	
OPEN ROAD FILMS, LLC, a Delaware limited liability company, <i>et al.</i> , ¹)	Case No. 18-12012-LSS
)	
Debtors.)	Hearing Date: December 17, 2018 at 2:00
)	Objection Deadline: December 10, 2017

**NOTICE OF MOTION OF CLUNE CONSTRUCTION COMPANY, LP FOR
RELIEF FROM THE AUTOMATIC STAY**

TO: (I) COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION; (II) COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; (III) OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; AND (IV) ANY OTHER PARTY WITH AN INTEREST IN THE LEASED PREMISES (AS DEFINED IN THE MOTION)

PLEASE TAKE NOTICE that Clune Construction Company, LP (the “Movant”) has filed a **Motion For Relief From The Automatic Stay** (the “Motion”) seeking relief pursuant to section 362(d) of the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.*, to the extent necessary, so that it may proceed to and complete a foreclosure on its mechanic’s lien recorded against the premises located at 2049 Century Park East, Los Angeles, California and proceed against certain non-debtor parties in order to collect amounts due and owing to it for services rendered at the premises.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on **December 17, 2018 at 2:00 P.M. ET** (the “Hearing Date”) 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.

PLEASE TAKE FURTHER NOTICE that **any response or objection to the Motion (including the supporting documentation required by Local Rule 4001-1(c), if applicable) must be filed at least seven days before the Hearing Date** (the “Objection Deadline”). At the same time, you must also serve a copy of the response upon the undersigned counsel to the Movant so as to be received on or before the Objection Deadline.

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. They will be referred to herein collectively as the “*Debtors*”.

PLEASE TAKE FURTHER NOTICE that the Hearing Date may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Local Rules, the attorneys for the parties shall confer with respect to the issues raised by the motion in advance of the Hearing Date for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

Dated: October 26, 2018
Wilmington, Delaware

/s/ Sommer L. Ross
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