

VERITAS

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U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

Veritas Technologies LLC
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November 1, 2018

BY FEDERAL EXPRESS

Office of the Clerk
United States Bankruptcy Court
District of Delaware
824 N. Market Street
Wilmington, DE 19801

Re: In re Open Road Films, LLC; Case No. 18-12012(LSS)
United States Bankruptcy Court, District of Delaware
Veritas Technologies LLC's Objection to Cure Notice

To the Honorable United States Bankruptcy Court:

Veritas Technologies LLC ("Veritas") hereby objects to the proposed cure amount regarding Veritas' professional services contract (the "Contract") with the above-referenced Debtors ("Debtors") as reflected in Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases (D.E. 172) (the "Cure Notice") as follows.

Debtors recognize the Contract as contract Number 257 in Exhibit 1 to the Cure Notice ("Exhibit 1"). Exhibit 1, however, reflects a proposed cure amount for the Veritas Contract as of November 30, 2018 of \$100.80. The Contract, however, is set to auto-renew on or about November 12, 2018 (*i.e.*, prior to the anticipated November 30, 2018 closing date of Debtors' proposed sale transaction in this bankruptcy case), at which time an auto-renewal fee of \$3,780.00 immediately will be due and payable from Debtors to Veritas under the Contract.

Accordingly, unless Debtors reject the Contract prior to November 12, 2018, the Cure Notice is incorrect as to the Contract. Veritas, therefore, objects to the proposed \$100.80 cure amount, objects to the proposed assumption and assignment of the Contract in connection with any sale of Debtors' assets or otherwise, and demands that Debtors remit the sum of \$3,780 to Veritas on or before the November 12, 2018 Contract auto-renew date, or else the Contract will not auto-renew effective as of that date.

Veritas reserves all other rights and remedies under, and in connection with, the Contract and with the proposed assumption and assignment of the Contract.

Very truly yours,

Veritas Technologies LLC

By: 

David Lucero
Director, Global Litigation and Employment Law

cc: Debtors' Counsel:
Jonathan N. Weiss, Esq.
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