

**IN THE 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:
November 9, 2018 at 10:00 a.m. (ET)

Requested Objection Deadline:
November 7, 2018 at 4:00 p.m. (ET)

**NOTICE OF MOTION OF VIACOM INTERNATIONAL INC.
PURSUANT TO SECTIONS 362(d) AND 553 OF THE BANKRUPTCY CODE
FOR RELIEF FROM THE AUTOMATIC STAY TO EFFECTUATE SETOFF**

PLEASE TAKE NOTICE that on November 2, 2018, Viacom International Inc., by and through its undersigned counsel, filed the **Motion Of Viacom International Inc. Pursuant To Sections 362(d) And 553 Of The Bankruptcy Code For Relief From The Automatic Stay To Effectuate Setoff** (the "Motion").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion, must: (a) be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **November 7, 2018 at 4:00 p.m. (ET) (REQUESTED)** (the "Response Deadline"); and (b) be served so as to be received by the undersigned counsel on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON **NOVEMBER 9, 2018 AT 10:00 A.M. (ET) (REQUESTED)** BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM #2, WILMINGTON, DELAWARE 19801.

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

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.

Dated: Wilmington, Delaware
November 2, 2018

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Derek C. Abbott

Derek C. Abbott (No. 3376)
Matthew B. Harvey (No. 5186)
1201 North Market Street, 16th Floor
Wilmington, Delaware 19801
Telephone: (302) 658-9200
Facsimile: (302) 658-3989
Email: dabbott@mnat.com
mharvey@mnat.com

-and-

LUSKIN, STERN & EISLER LLP

Richard Stern
Stephan E. Hornung
Eleven Times Square
New York, New York 10036
Telephone: (212) 597-8200
Facsimile: (212) 974-3205
Email: luskin@lsellp.com
stern@lsellp.com
hornung@lsellp.com

Counsel for Viacom International Inc.

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