

EXHIBIT A

Stipulation

**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)

STIPULATION EXTENDING THE GUILD CLAIMS OBJECTION DEADLINE

WHEREAS, on September 6, 2018, Open Road Films, LLC and several affiliates (collectively, the “Debtors”) filed voluntary petitions under chapter 11 of title 11;

WHEREAS, on October 2, 2018, the Bankruptcy Court entered that certain *Final Order, Pursuant to Sections 105(a), 361, 362, 363(c), 503(b), and 507(b) of the Bankruptcy Code, (I) Authorizing Debtors to Use Cash Collateral, (II) Granting Adequate Protection, and (III) Granting Related Relief* [Docket No. 135] (as subsequently amended, the “Cash Collateral Order”);²

WHEREAS, paragraph 19(vi) of the Cash Collateral Order sets a deadline for objections to any “Guild Secured Claims” that may be filed by the Guilds (such deadline, the “Guild Claim Objection Deadline”);

WHEREAS, on or about January 24, 2019, the Guilds and the Motion Picture Industry Pension and Health Plans (the “MPIPHP”) filed numerous proofs of claim in the Debtors’

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 1800 Century Park East, Suite 600, Los Angeles, California 90067.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Cash Collateral Order.

chapter 11 cases, which proofs of claim assert various secured, administrative, priority, and general unsecured claims;

WHEREAS, the Debtors are negotiating with the Guilds and the MPIPHP regarding a comprehensive resolution of all filed and asserted claims; and

WHEREAS, the parties wish to extend the Guild Claim Objection Deadline pending the conclusion of their negotiations.

NOW, THEREFORE, the parties, by and through their undersigned counsel, hereby stipulate as follows:

1. The Guild Claim Objection Deadline is extended through and including **Friday, May 24, 2019**.
2. The terms of this stipulation shall be binding on, and inure to the benefit of, the Debtors, the Guilds and the MPIPHP, and any other party in interest that had standing, as of October 2, 2018, to object to a Guild or MPIPHP proof of claim, including any trustee, any other representative of the Debtors' bankruptcy estates, the Prepetition Secured Parties, and the Committee.
3. This stipulation shall become effective only upon the date on which execution of this stipulation has been authorized by counsel to all of the parties hereto.
4. This stipulation shall not be modified, altered, amended, or vacated without written consent of all the parties hereto.
5. The parties expressly consent and submit to the exclusive jurisdiction of the Bankruptcy Court regarding any actions or proceedings relating to the enforcement or interpretation of this stipulation.

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The foregoing terms are agreed to and stipulated as of April 2, 2019.

/s/ Robert F. Poppiti, Jr.

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