

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

RAINBOW PRODUCTION SERVICES, LLC,
et al.,¹

Debtors.

Chapter 11

Case No. 24-12564 (KBO)

(Joint Administration Requested)

AMENDED² NOTICE OF HEARING TO CONSIDER FIRST DAY PLEADINGS

This remote hearing will be conducted entirely over Zoom.

Please refer to Judge Owens's Chambers Procedures (<https://www.deb.uscourts.gov/content/judge-karen-b-owens>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Owens's expectations of remote participants, and the advance registration requirements. **Registration is required one-hour prior to the hearing unless otherwise noticed using the [eCourtAppearances](#) tool available on the Court's website.**

PLEASE TAKE NOTICE that on November 4, 2024, Rainbow Production Services, LLC and its above-captioned affiliated debtors in possession (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 1041-1532, as amended (the "Bankruptcy Code") with the Clerk of the United States Bankruptcy Court of the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that the Debtors continue to operate their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

¹ The address of the Debtors is 9000 Sunset Blvd., Ste. 1400, Los Angeles, CA 90069. The last four digits of the Debtors' federal tax indemnification numbers are: (i) Rainbow Production Services, LLC (4758); (ii) Rainbow Digital Services, LLC (9827); (iii) Film Finances, Inc. (7130); and (iv) EPS-Cineworks, Inc. (3355).

² Amended item appear in bold.

PLEASE TAKE FURTHER NOTICE that a hearing (the “First Day Hearing”) will be held **REMOTELY OVER ZOOM** before the Honorable Karen B. Owens, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, located at 824 North Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801 on **November 6, 2024** at 3:00 p.m. (ET) on the following motions requesting certain “first day” relief plus certain other “first day” motions not yet filed which will be reflected on a Notice of Agenda filed later today (collectively, the “First Day Pleadings”), which are being filed by the Debtors in connection with their chapter 11 cases (the “Chapter 11 Cases”):

1. Debtors’ Motion for Entry of Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [Filing Date: 11/4/24; [D.I. 3](#)]
2. Debtor’s Application for Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent Effective as of the Petition Date [Filing Date: 11/4/24; [D.I. 5](#)]
3. Debtors’ Motion for Entry of an Order (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 30 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, and (III) Granting Related Relief [Filing Date: 11/4/24; [D.I. 6](#)]
4. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Authorizing Continuation of Completion Guarantee Programs and Payments Thereunder, and (III) Granting Related Relief [Filing Date: 11/4/24; [D.I. 7](#)]
5. Debtors’ Motion for Entry of Interim and Final Orders (I)(A) Approving the Debtors’ Proposed Adequate Assurance of Payment to Utility Companies, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [Filing Date: 11/4/24; [D.I. 8](#)]
6. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filing Date: 11/4/24; [D.I. 9](#)]

7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue their Existing Cash Management Systems, including Continued Use of Existing Bank Accounts and Business Forms, (B) Continue Intercompany Transactions, and (C) Honor all Obligations Related Thereto, and (II) Granting Related Relief [Filing Date: 11/4/24; [D.I. 11](#)]
8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Providing Adequate Protection, (IV) Granting Liens, Security Interests, and Superpriority Claims, (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Filing Date: 11/5/24; [D.I. 12](#)]

Copies of the First Day Pleadings may be inspected in the offices of the Clerk of the Bankruptcy Court during normal business hours or downloaded from the Bankruptcy Court's website at www.deb.uscourts.gov. Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents. Parties in interest may sign up for a PACER account by visiting the PACER website at <http://pacer.psc.uscourts.gov> or by calling (800) 676-6856. Additionally, copies of the First Day Pleadings and all other papers filed in the Chapter 11 Cases are available free of charge from the website of the Debtors' proposed claims, and notice agent, Donlin, Recano & Company, Inc. www.donlinrecano.com/rps.

Dated: November 5, 2024
Wilmington, Delaware

BAYARD, P.A.

/s/ Ericka F. Johnson

Ericka F. Johnson, Esq. (DE Bar No. 5024)

Steven D. Adler, Esq. (DE Bar No. 6257)

600 North King Street, Suite 400

Wilmington, Delaware 19801

Telephone: (302) 655-5000

E-mail: ejohnson@bayardlaw.com

sadler@bayardlaw.com

-and-

**LEVENE, NEALE, BENDER, YOO &
GOLUBCHIK L.L.P**

David L. Neale, Esq. (admitted *pro hac vice*)

Krikor J. Meshefejian, Esq. (admitted *pro hac vice*)

2818 La Cienega Avenue

Los Angeles, CA 90034
Telephone: (310) 229-1234
Email: DLN@lnbyg.com
KJM@lnbyg.com

*Proposed Counsel to the Debtors and
Debtors in Possession*