

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
	)	
VILLAGE ROADSHOW ENTERTAINMENT	)	Case No. 25-10475 (TMH)
GROUP USA INC., <i>et al.</i> , ¹	)	
	)	(Jointly Administered)
Debtors.	)	
	)	Objection Deadline: Nov. 5, 2025 at 4:00 p.m. (ET)
	)	Hearing Date: Nov. 14, 2025 at 10:00 a.m. (ET)

**SUPPLEMENT TO SECOND INTERIM FEE REQUEST OF
YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Young Conaway Stargatt & Taylor, LLP ("Young Conaway"), co-counsel to the above-captioned debtors and debtors in possession (collectively, the "Debtors"), hereby supplements the *Second Interim Fee Request of Young Conaway Stargatt & Taylor, LLP* (the "Second Interim Application") for the period from June 1, 2025, through and including August 31, 2025 (the "Application Period") by attaching, as **Exhibits A** through **E** hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the "UST Guidelines"). In addition, Young Conaway respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

- a. During the Application Period, Young Conaway did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms.

1 The last four digits of Village Roadshow Entertainment Group USA Inc.'s federal tax identification number are 0343. The mailing address for Village Roadshow Entertainment Group USA Inc. is 750 N. San Vicente Blvd., Suite 800 West, West Hollywood, CA 90069. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors and the last four digits of their federal tax identification is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/vreg>.



- b. The fees sought by Young Conaway in the Second Interim Application are less than 10% higher than the fees budgeted in the budget provided by Young Conaway to the Debtors for Application Period.
- c. The professionals included in the Second Interim Application did not vary their hourly rate based on the geographic location of the bankruptcy cases.
- d. The Second Interim Application did not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.
- e. The time covered by the Second Interim Application includes approximately 0.80 hours with a value of \$688.00 spent by Young Conaway to ensure that the time entries subject to the Second Interim Application comply with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Young Conaway's preparation of each monthly fee application.
- f. The Second Interim Application did not include any rate increases since the effective date of the Court's approval of Young Conaway's retention.

Dated: October 15, 2025
Wilmington, Delaware

/s/ Joseph M. Mulvihill

**YOUNG CONAWAY STARGATT &
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*Co-Counsel for the Debtors and
Debtors in Possession*

EXHIBIT A**CUSTOMARY AND COMPARABLE
COMPENSATION DISCLOSURES**

Young Conaway's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by similarly skilled bankruptcy attorneys. In addition, Young Conaway's hourly rates for bankruptcy services are comparable to the rates charged by the Firm for other complex corporate and litigation matters. The rates charged by the Firm for the services performed in the prior calendar year in the practice areas that are comparable to the services performed by the Bankruptcy and Corporate Restructuring section – namely, Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation -are set forth below. Also included below is 2024 blended hourly rate information for all sections of the Firm, excluding the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

Category of Timekeeper	Blended Hourly Rate		
	Billed In comparable practice areas for preceding calendar year ¹	Billed Firm-wide for preceding calendar year ²	Billed This Application
Partner	\$971	\$998	\$879
Counsel	\$773	\$685	N/A
Associate	\$551	\$542	\$518
Paralegal	\$359	\$235	\$394
Aggregated:	\$715	\$705	\$590

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- 1 This column reflects the blended 2024 rates charged by the firm for complex corporate and litigation matters in the following sections of the firm: Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation.
 - 2 This column excludes blended hourly rates for the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

EXHIBIT B**SUMMARY OF TIMEKEEPERS INCLUDED IN THE
FIRST INTERIM APPLICATION**

Name	Title	Department	Date of First Admission	Fees Billed in the Application Period (\$)	Hours Billed in the Application Period	Hourly Rate Billed in the Application Period (\$)
Michael S. Neiburg	Partner	Bankruptcy	2009	\$8,170.00	7.60	\$1,075.00
Joseph M. Mulvihill	Partner	Bankruptcy	2015	\$66,564.00	77.40	\$860.00
Christopher M. Lambe	Associate	Bankruptcy	2022	\$272.00	0.40	\$680.00
Carol E. Thompson	Associate	Bankruptcy	2022	\$3,712.00	6.40	\$580.00
Benjamin C. Carver	Associate	Bankruptcy	2023	\$37,543.50	72.90	\$515.00
Brynna M. Gaffney	Associate	Bankruptcy	2024	\$6,950.00	13.90	\$500.00
Debbie Laskin	Paralegal	Bankruptcy		\$30,375.50	76.90	\$395.00
Brenda Walters	Paralegal	Bankruptcy		\$790.00	2.00	\$395.00
Hubert T. Hannagan	Paralegal	Bankruptcy		\$4,158.00	10.80	\$385.00
Troy Bollman	Paralegal	Bankruptcy		\$192.50	0.50	\$385.00
Totals				\$158,727.50	268.80	

EXHIBIT C

BUDGET AND STAFFING PLAN

BUDGET \$400,000.00		
Project Category	Estimated Hours	Estimated Fees
Case Administration (B001)	77.40	\$47,664.00
Court Hearings (B002)	103.20	\$63,552.00
Cash Collateral/DIP Financing (B003)	32.30	\$19,860.00
Schedules & Statements, U.S. Trustee Reports (B004)	38.70	\$23,832.00
Lease/Executory Contract Issues (B005)	12.90	\$7,944.00
Use, Sale or Lease of Property (363 issues) (B006)	90.30	\$55,608.00
Claims Analysis, Objections and Resolutions (B007)	12.90	\$7,944.00
Meetings (B008)	25.80	\$15,888.00
Stay Relief Matters (B009)	6.50	\$3,972.00
Reclamation Claims and Reclamation Adversaries (B010)	6.50	\$3,972.00
Other Adversary Proceedings (B011)	6.50	\$3,972.00
Plan and Disclosure Statement (B012)	51.60	\$31,776.00
Creditor Inquiries (B013)	6.50	\$3,972.00
General Corporate Matters (B014)	6.50	\$3,972.00
Employee Matters (B015)	12.90	\$7,944.00
Asset Analysis (B016)	6.50	\$3,972.00
Retention of Professionals/Fee Issues (B017)	109.70	\$67,524.00
Fee Application Preparation (B018)	19.40	\$11,916.00
Travel (B019)	6.50	\$3,972.00
Utility Services (B020)	12.90	\$7,944.00
Total	645.50	\$397,200.00

STAFFING PLAN		
Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budgeted Period	Average Rate¹
Partner	2	\$892.75
Counsel	-	-
Associate (7 or more years since first admission)	-	-
Associate (4-6 years since first admission)	-	-
Associate (less than 4 years since first admission)	2	\$508.76
Paralegal	2	\$395.00

¹The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the Budgeted Period.

EXHIBIT D**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT**

SUMMARY OF COMPENSATION BY PROJECT CATEGORY		
Project Category	Hours Billed	Fees Sought (\$)
Case Administration (B001)	13.00	\$5,985.50
Court Hearings (B002)	61.90	\$37,593.50
Schedules & Statements, U.S. Trustee Reports (B004)	21.90	\$12,435.50
Lease/Executory Contract Issues (B005)	3.10	\$1,224.50
Use, Sale or Lease of Property (B006)	56.50	\$40,754.50
Claims Analysis, Objections & Resolutions (B007)	5.30	\$3,025.00
Meetings (B008)	6.20	\$4,061.00
Stay Relief Matters (B009)	3.30	\$1,918.00
Other Adversary Matters (B011)	8.10	\$6,340.50
Plan and Disclosure Statement (B012)	8.00	\$4,273.00
Employee Matters (B015)	5.60	\$3,196.50
Asset Analysis (B016)	1.40	\$1,204.00
Retention of Professionals/Fee Issues (B017)	63.90	\$30,437.50
Fee Application Preparation (B018)	7.80	\$4,104.00
Travel (B019)	1.50	\$1,505.00
Purchaser Representation (B021)	1.30	\$669.50
Totals	268.80	\$158,727.50

SUMMARY OF EXPENSE REIMBURSEMENT	
	Amount (\$)
Car/Bus	\$1,393.38
Computerized Legal Research	\$93.32
Delivery	\$167.00
Docket Retrieval	\$34.40
Filing Fee	\$100.00
Reproduction	\$2,833.70
Transcript	\$388.00
Working Meals	\$4,764.20
Total	\$9,774.00

EXHIBIT E

SUMMARY OF SECOND INTERIM APPLICATION	
Name of Applicant	Young Conaway Stargatt & Taylor, LLP
Name of Client	Debtors and Debtors in Possession
Time period covered by First Interim Application	June 1, 2025 – August 31, 2025
Total compensation sought during the Application Period	\$158,727.50
Total expenses sought during the Application Period	\$9,774.00
Petition Date	March 17, 2025
Retention Date	March 17, 2025
Date of order approving employment	April 17, 2025
Total compensation approved by interim order to date [D.I. 775]	\$346,762.50
Total expenses approved by interim order to date [D.I. 775]	\$11,685.05
Total allowed compensation paid to date	\$423,202.50
Total allowed expenses paid to date	\$19,193.76
Blended rate in the Second Interim Application for all attorneys	\$690.00
Blended rate in the Second Interim Application for all timekeepers	\$590.00
Compensation sought in the Second Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed (80%)	\$126,981.60
Expenses sought in the Second Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed (100%)	\$9,774.00
Number of professionals included in the Second Interim Application	10
If applicable, number of professionals in the Second Interim Application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought during the Application Period	Budget Amount: \$400,000.00 Amount Sought: \$158,727.50
Number of professionals billing fewer than 15 hours to the case during the Application Period	6
Are any rates higher than those approved or disclosed at retention?	No