

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

VILLAGE ROADSHOW ENTERTAINMENT
GROUP USA INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10475 (TMH)

(Jointly Administered)

Hearing Date: November 14, 2025 at 10:00 a.m. (ET)
Objection Deadline: November 3, 2025 at 4:00 p.m. (ET)

Ref. No. 964

NOTICE OF MOTION

TO: (a) the United States Trustee for the District of Delaware; (b) the Debtors; (c) Warner Bros. Entertainment Inc.; (d) Regency Entertainment (USA), Inc.; (e) the Official Committee of Unsecured Creditors; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE NOTICE that on October 20, 2025, Alcon Media Group, LLC (“Alcon”) filed *Alcon Media Group, LLC’s Motion to File Under Seal (A) Alcon Media Group, LLC’s (I) Joinder to the Debtors’ Response to Warner Bros. Entertainment Inc.’s and Regency Entertainment (USA), Inc.’s Objection to Entry of the Derivative Rights Sale Order and (II) Response to Warner Bros. Entertainment Inc.’s and Regency Entertainment (USA), Inc.’s Objection; and (B) Declaration of Broderick Johnson In Support Thereof* [D.I. 964] (the “Motion”).²

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **November 3, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection upon the undersigned counsel to Alcon so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON NOVEMBER 14, 2025 AT 10:00 A.M. (ET) BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY COURT JUDGE

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>.

² Capitalized terms used but not defined herein shall have the meanings given to them in the Motion.



2510475251020000000000011

FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR,
COURTROOM #5, WILMINGTON, DELAWARE 19801.

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

Dated: October 20, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Colin R. Robinson

Kimberly Brown (No. 5138)
Colin R. Robinson (No. 5524)
Katherine S. Dute (No. 6788)
Soumya P. Venkateswaran (No. 7278)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Email: brown@lrclaw.com
robinson@lrclaw.com
dute@lrclaw.com
venkateswaran@lrclaw.com

- and -

MILLER BARONDESS LLP

Daniel S. Miller (admitted *pro hac vice*)
Colin H. Rolfs (admitted *pro hac vice*)
2121 Avenue of the Stars, Suite 2600
Los Angeles, California 90067
Telephone: (310) 552-4400
Email: dmiller@millerbarondess.com
crolfs@millerbarondess.com

Counsel to Alcon Media Group, LLC