

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

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

Debtors.

WARNER BROS. ENTERTAINMENT, INC.,

Appellant,

v.

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

Appellees.

Chapter 11

Bankr. Case No. 25-10475 (TMH)

(Jointly Administered)

U.S. District Court

C.A. No. 25-cv-01405-CFC

**APPELLEE ALCON MEDIA GROUP, LLC'S COUNTER-DESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

Appellee Alcon Media Group, LLC ("Appellee" or "Alcon"), by and through its undersigned counsel, respectfully submits, pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure and Rule 8009-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, this counter-designation of items to be included in the record on appeal (the "Counter-Designation") with respect to the appeal by Warner Bros. Entertainment Inc. ("Appellant" or "Warner Bros.") from the *Order (I) Approving the Sale of the Derivative Rights Free and Clear of Liens, Claims, Interests, and Encumbrances, (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief* [Bankr. D.I. 1043] (the "Order") before the United States District Court for the District of Delaware (the "Appeal"). Pursuant to the Court's standing order dated



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November 9, 2015, titled *Designations of Records in Bankruptcy Appeals*, Appellee hereby files this Counter-Designation with the District Court.

**COUNTER-DESIGNATION OF ITEMS TO BE
INCLUDED IN THE RECORD ON APPEAL**

1. Appellee counter-designates the following items to be included in the record on Appeal:

Item No.	Bankruptcy Docket No.	Description
1.	N/A	[SEALED] Wayne Smith Deposition Transcript (October 8, 2025)
2.	884	<i>Notice of Service of (i) Alcon Media Group, LLC's Responses and Objections to Warner Bros. Entertainment Inc.'s Notice of 30(B)(6) Deposition; (ii) Alcon Media Group, LLC's Responses to Warner Bros. Entertainment Inc.'s Initial Requests for Production in Connection with Derivative Rights Sale Hearing; (iii) Alcon Media Group, LLC's Responses to Warner Bros. Entertainment Inc.'s Initial Requests for Admission in Connection with Derivative Rights Sale Hearing; (iv) Alcon Media Group, LLC's Responses to Warner Bros. Entertainment Inc.'s Initial Interrogatories in Connection with Derivative Rights Sale Hearing; and (v) Verifications to Alcon Media Group, LLC Responses to Warner Bros. Entertainment Inc. Discovery Requests</i>

STATEMENT REGARDING ISSUES ON APPEAL

Appellee contests Appellant's statement of issues on appeal and will address them at the appropriate time in this proceeding.

RESERVATION OF RIGHTS

Appellee expressly reserves the right to supplement the record on Appeal and to adopt the designation of any items designated or counter-designated by Appellant, any other appellee, or cross-appellee to the Appeal from the Order.

[Remainder of page intentionally left blank]

Dated: December 16, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Colin R. Robinson

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