

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

BRON Media Holdings USA Corp. *et al.*,
Debtors in a Foreign Proceeding.

Chapter 15

Case No. 23-56798-PMB

Jointly Administered

MOTION FOR EXPEDITED HEARING

COMES NOW BRON Media Corp.¹ (“BRON”), in its capacity as the Canadian Court-appointed and authorized foreign representative (the “Foreign Representative”), for the above captioned Debtors (collectively, the “Debtors”, and each individually, a “Debtor”), by and through the undersigned counsel, and hereby files this *Motion for Expedited Hearing* (the “Motion”). In support of the Motion, the Foreign Representative shows the Court as follows:

1. On July 19, 2023, each Debtor commenced their respective Chapter 15 case (collectively, the “Cases”) by the filing of a *Chapter 15 Petition for Recognition of a Foreign Proceeding*, along with an accompanying *Omnibus Verified Petition for (I) Recognition of Foreign*

¹ The U.S. Debtors in these Chapter 15 cases and the last four digits of their U.S. Federal Employer Identification Numbers are as follows: BRON Creative USA Corp (1363); BRON Digital USA, LLC (0276); BRON Life USA Inc. (1178); BRON Media Holdings USA Corp (0637); BRON Releasing USA Inc. (6368); BRON Studios USA Inc. (8784); BRON Ventures 1 LLC (5066); BRON Studios USA Developments Inc. (7529); Bakhorma, LLC (6944); Drunk Parents, LLC (5462); Fables Holdings USA, LLC (8085); Fables Productions USA INC. (5169); Gossamer Holdings USA, LLC (2582); Gossamer Productions USA, Inc. (7876); Harry Haft Productions, Inc. (6144); Heavyweight Holdings, LLC f/k/a Harry Haft Films, LLC (8193); I am Pink Productions, LLC (6681); Lucite Desk, LLC (2546); National Anthem Holdings, LLC f/k/a BCDC Holdings, LLC (6943); National Anthem ProdCo Inc. (8637); Oakland Pictures Holdings, LLC (4988); Pathway Productions, LLC (Del. Incorporation No. 3081); Robin Hood Digital PC USA Inc. (2499); Robin Hood Digital USA, LLC (4302); Solitary Holdings USA, LLC (3013); Surrounded Holdings USA LLC (8868); Welcome to Me, LLC (8500) (hereinafter collectively referred to as the “Debtors”). The Debtors’ principal offices are located at 1700-Park Place, 666 Burrard Street, Vancouver, British Columbia, Canada.

Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of The Bankruptcy Code (collectively, the “Chapter 15 Petitions”).

2. On July 20, 2023, in the Debtors’ jointly administered main case, the Foreign Representative filed a *Motion of Foreign Representative for an Order Granting Certain Provisional Relief* (Docket No. 9) (the “Provisional Relief Motion”) and *Motion of Foreign Representative for Order (I) Scheduling Hearing on Verified Petition Under Chapter 15 of the Bankruptcy Code for Recognition of a Foreign Main Proceeding and for Additional Relief and Assistance Under 11 U.S.C. §§105(a), 1507, and 1521 and (II) Specifying Form and Manner of Service of Notice of Hearing* (Docket No. 8) (the “Scheduling and Notice Motion”, together with the Provisional Relief Motion, the “First Day Motions”).

3. In the First Day Motions, the Foreign Representative requests the Court enter an order recognizing the Canadian CCAA proceeding, authorize the DIP loan, extend or impose the protections of Sections 362 and 365(e) to each Debtor, extend the protections of Section 364 to the DIP lender, order the joint administration of the Cases, and specify the form and manner of service for the Cases.

4. Section 1519 permits the Court to grant certain relief upon the filing of a Chapter 15 petition. Such relief may be granted where “relief is urgently needed to protect the assets of the debtor or the interests of the creditors.” *See* 11 U.S.C. § 1519(a).

5. The relief requested in the First Day Motions is urgently needed in these Chapter 15 cases. Without immediate DIP financing and the cessation of all creditor collection efforts, the Debtors will be unable to sustain their business operations and will be unable to reorganize in an orderly fashion, harming Debtors and their creditors alike.

6. As point in fact, essential funding under the DIP loan agreement has been made explicitly contingent on recognition of that DIP loan. More specifically, Sections 8, Sub-Sections 2(a) and 3(b) of the DIP loan agreement makes it a predicate condition to the Debtors receiving a second and third advance that the DIP loan has been provisionally recognized by this Court. If the second and third advance are not made, the Debtors will ultimately be unable to meet their obligations and maintain the operations of their businesses.

7. Foreign Representative requests the Court hold an expedited hearing on the First Day Motions on the Court's earliest possible Court date, so that the Court may evaluate the provisional relief being sought.

WHEREFORE, the Foreign Representative respectfully requests that this Court shorten any applicable notice period, schedule an expedited hearing on the First Day Motions as soon as possible, grant the provisional relief requested in the First Day Motions, and grant such other relief as may be just and proper.

RESPECTFULLY SUBMITTED this 20th day of July, 2023.

JONES & WALDEN LLC

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