

No. S-235084
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED

AND

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
S.B.C. 2002, c. 57, AS AMENDED AND THE BUSINESS CORPORATIONS ACT, R.S.O.
1990, C. B.16, AS AMENDED

AND

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
BRON MEDIA CORP. AND THE ENTITIES LISTED AT SCHEDULE "A"
PETITIONERS

SEALING ORDER

BEFORE THE HONOURABLE

JUSTICE GOMERY

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November 7, 2023

THE APPLICATION of the Petitioners coming on for hearing at Vancouver, British Columbia, on the 7th of November, 2023, AND ON HEARING Asim Iqbal and David Ward, counsel for the Petitioners and those other counsel listed on **Schedule "B"** hereto;

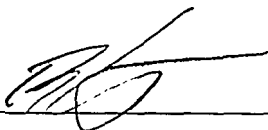
THIS COURT ORDERS THAT:

1. The following documents be sealed by the Registrar of this Honourable Court for the duration noted:

Description	Date filed, if applicable:	Number of Copies Filed, including any extra copies for the judge.	Duration of sealing order:	Sought	Granted	
					Yes	No
1a) Specific documents: Affidavit #1 of Mildred Schutte, made on November 24, 2023, attaching as Exhibits the documents listed as Confidential Appendices 1, 3, 4, and 5 to the Third Report of the Monitor in this matter, dated October 26, 2023.	To be filed.	1	Until the earlier of: (a) the filing of the Monitor's Certificate confirming completion of the transactions contemplated by the Asset Purchase Agreement dated October 24, 2023 between BRON Media Group and various other entities of the first part and Creative Wealth Media Lending LP 2016 of the second part, and the final determination of any Court in respect of any appeals in connection thereto; and (b) further order of the court.	Yes	Yes	
1b) Entire court file				No	N/A	N/A

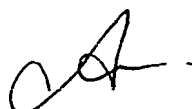
2) Other court records stored the court:				No	N/A	N/A
3) Orders				No	N/A	N/A
4) <u>Reasons for Judgement</u>				No	N/A	N/A

2. Access to the sealed items is restricted to counsel for the Petitioners and counsel for the Monitor.
3. Notwithstanding this order, counsel for the Petitioners are directed to provide a copy of Confidential Appendix 1 to counsel for Access Road Capital, LLC and the Ad Hoc Group of Investor Creditors listed at **Schedule "C"** hereto.
4. Endorsement of this Order by anyone other than counsel for the Petitioners is hereby dispensed with.


 Signature of
☐ Party ☒ Lawyer for the Petitioners

for Asim Iqbal

BY THE COURT


 REGISTRAR



Schedule "A"

List of Petitioners

	Debtor Company	Jurisdiction
1.	BRON Animation Inc.	British Columbia
2.	BRON Creative Corp.	Ontario
3.	BRON Developments Inc.	British Columbia
4.	BRON Media Corp.	British Columbia
5.	BRON Media Holdings Intl. Corp.	British Columbia
6.	BRON Media Holdings USA Inc.	British Columbia
7.	BRON Releasing Inc.	British Columbia
8.	BRON Studios Inc.	British Columbia
9.	BRON Ventures 1 (Canada) Corp	British Columbia
10.	BRON Everest Productions Inc.	Ontario
11.	Fables Productions BC Inc.	British Columbia
12.	Gossamer Productions BC Inc.	British Columbia
13.	Hench 2 BC Productions Inc.	British Columbia
14.	Henchmen Productions Inc.	British Columbia
15.	Robin Hood Digital PC BC Inc.	British Columbia
16.	Windor Productions BC Inc.	British Columbia
17.	BRON Creative USA, Corp.	Nevada
18.	BRON Digital USA, LLC	Delaware
19.	BRON Life USA Inc. (BRON Legacy USA Inc.)	Delaware
20.	BRON Media Holdings USA Corp.	Delaware
21.	BRON Releasing USA Inc.	Delaware
22.	BRON Studios USA Inc.	Nevada
23.	BRON Ventures 1, LLC	Delaware

24.	BRON Studios USA Developments Inc.	Nevada
25.	Bakhorma, LLC	Washington
26.	Drunk Parents, LLC	New York
27.	Fables Holdings USA, LLC	Delaware
28.	Fables Productions USA Inc.	Delaware
29.	Gossamer Holdings USA, LLC	Delaware
30.	Gossamer Productions USA Inc.	Delaware
31.	Harry Haft Productions, Inc.	New York
32.	Heavyweight Holdings, LLC (previously Harry Haft Films, LLC)	Delaware
33.	I Am Pink Productions, LLC	Delaware
34.	Lucite Desk, LLC	Delaware
35.	National Anthem Holdings, LLC (f. k. a. BCDC Holdings, LLC)	Delaware
36.	National Anthem ProdCo Inc.	New Mexico
37.	Oakland Pictures Holdings, LLC	Delaware
38.	Pathway Productions, LLC	Delaware
39.	Robin Hood Digital PC USA Inc.	Delaware
40.	Robin Hood Digital USA, LLC	Delaware
41.	Solitary Holdings USA, LLC	Delaware
42.	Surrounded Holdings USA LLC	Delaware
43.	Welcome to Me, LLC	California
44.	Front Runner Productions, Inc.	Georgia
45.	Brown Army, LLC	Nevada
46.	Fonzo Production Services Inc.	Louisiana

47.	Fonzo, LLC	Nevada
48.	Front Runner, LLC	Nevada
49.	Green Moon Inc.	Washington
50.	Harmon Films, LLC	New York
51.	Harmon Monster Films, Inc.	New York
52.	Needle In A Timestack, LLC	Delaware
53.	Para Productions, LLC	Nevada
54.	Red Sea LLC	Nevada
55.	Red Sea Productions Inc.	Nevada
56.	Tully Productions, LLC	Nevada
57.	TWWMD Holdings, LLC	Delaware
58.	TWWMD Productions, Inc.	Nevada
59.	Villains Pictures, LLC	Nevada
60.	Villains Production Services, Inc.	New York
61.	Surrounded Productions USA Inc.	Delaware

Schedule “B”
List of Counsel

NAME	PARTY
Asim Iqbal, Miller Thomson LLP	Counsel for Petitioners
David Ward, Miller Thomson LLP	Counsel for Petitioners
Bryan Hicks, Miller Thomson LLP	Counsel for Petitioners
Monica Faheim, Miller Thomson LLP	Counsel for Petitioners
John N. Birch, Cassels Brock & Blackwell LLP	Counsel to the Monitor
Forrest Finn, Cassels Brock & Blackwell LLP	Counsel to the Monitor
Dominique Michaud, Robins Appleby LLP	Counsel for Desert Investment Management LLC
Samuel Mosonyi, Robins Appleby LLP	Counsel for Desert Investment Management LLC
Kathryn Esaw, Osler, Hoskin & Harcourt LLP	Counsel for Screen Actors Guild American Federation of Television and Radio Artists
David Ahdoot, Bush Gottlieb	U.S. Counsel to Screen Actors Guild American Federation of Television and Radio Artists
Peter Bychawski, Blakes, Cassels & Graydon LLP	Counsel for Access Road Capital, LLC
Hilary Book, Book Law	Bayshore Capital Advisors, LLC, GCA Alternative Income Fund LP and Rocking T. Ranch LLP
Laurie Graham, Orr Taylor LLP	Counsel to certain investors in Creative Wealth Media
Robin Schwill, Davies Ward Phillips & Vineberg LLP	Counsel to Media Res Studio, LLC
Joshua Foster, Bennett Jones LLP	Canadian Counsel to Creative Wealth Media Lending LP 2016
Mark van Zandvoort, Aird Berlis LLP	Counsel to Hudson Private Corp. and Hudson LP
Bryan Bates, Parker, Hudson, Rainer & Dobbs LLP	U.S. Counsel to Creative Wealth Media Lending LP 2016
Mike Shakra, Bennett Jones LLP	Canadian Counsel to Creative Wealth Media Lending LP 2016

David Gruber, Bennett Jones LLP	Canadian Counsel to Creative Wealth Media Lending LP 2016
Dawid Cieloszczyk, Koskie Glavin Gordon LLP	Counsel to the Union of BC Performers
Wojtek Jaskiewicz, Weirfoulds LLP	Counsel to Premium Properties Limited and Agent to the Ad Hoc Group of Lenders
Tevia Jeffries, Farris LLP	Counsel to Hercules Film Investors I (US), Inc.
Clair Hildebrand, Blake Cassels & Graydon LLP	Counsel to Three Point Capital Holdings, LLC
Ryan Taylor, Crawley Mackewn Brush LLP	Counsel to James Richardson and NIKINK Holdings Ltd.
Shawn Kiefer, Fulcrum Advisors, LLC	Counsel to C&C Financial Services Lending II, LLC
DJ Miller, Thornton Grout Finnigan LLP	Counsel to William Morris Endeavour (WME)
Jason Wadden, Tyr LLP	Counsel to Catalyst Capital Media Fund

Schedule "C"

Ad Hoc Group of Investor Creditors

1. Premium Properties Limited
2. Colonia Trustco Inc.
3. Premium Trust Inc.
4. McFlow Capital Corp.
5. Bayshore Capital Advisors, LLC
6. BCA Alternative Income Fund LP
7. Rocking T. Ranch LLP
8. James Richardson
9. Nikink Holdings Ltd.
10. Lukis Global Corp.
11. Desert Media Partners LLC