

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE 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

**NOTICE OF FILING AND HEARING ON OMNIBUS
PETITION OF FOREIGN MAIN PROCEEDING AND RELATED RELIEF**

PLEASE TAKE NOTICE that on July 19, 2023, BRON Media Corp., in its capacity as the Canadian Court-appointed and authorized foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors”) in a reorganization proceeding (the “CCAA Proceeding”) commenced under Canada’s *Companies’ Creditors Arrangement Act* (the “CCAA”) pending before the Supreme Court of British Columbia (Court File No. S-235084), by the Foreign Representative’s undersigned United States counsel, filed an *Official Form Petition* for each of the Debtors. On July 20, 2023 the Foreign Representative filed the *Omnibus Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* (the “Petition for Recognition”) (Docket No. 7) and the Court entered an *Order Granting Provisional Relief and Continuing Hearing* (Docket No. 15) (the “Provisional Relief Order,” together with Petition for Recognition and all exhibits, declarations and other documents appended thereto or filed in connection therewith, the “Recognition Filings”). In the Recognition Filings the Foreign Representative sought, and the Court provisionally granted, (i) recognition of the CCAA Proceeding as “foreign main proceeding” and (ii) relief in aid of the CCAA Proceeding in the United States Bankruptcy Court for the Northern District of Georgia (the “Bankruptcy Court”) with respect to the Debtors, including certain additional relief pursuant to Sections 105, 362, 363, 365, 1507, and 1521 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that, pursuant to the *Order Scheduling Hearing on Verified Chapter 15 Petition and Specifying Form and Manner of Notice of Hearing* [Docket No. 16] (the “Scheduling Order”), the Bankruptcy Court has scheduled a virtual hearing on the Petition for Recognition for **August 14, 2023 commencing at 1:30 p.m Eastern Standard Time via Judge Baisier’s Virtual Hearing Room¹ (the “Hearing”).**

PLEASE TAKE FURTHER NOTICE that any response or objection to the relief requested in the Petition for Recognition must be (i) in writing describing the basis therefor; (ii) filed with the Clerk of the Bankruptcy Court, 75 Ted Turner Drive, SW, Room 1340, Atlanta, GA

¹ The link for the Virtual Hearing Room can be found on Judge Baisier’s webpage at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier> and is best used on a desktop or laptop computer but may be used on a phone or tablet. Participants’ devices must have a camera and audio.

30303, United States of America, **August 10, 2023 at 5:00 p.m. Eastern Standard Time.** (the “Objection Deadline”); and (iii) served upon JONES & WALDEN, LLC, 699 Piedmont Ave NE Atlanta, GA 30308, United States of America (Cameron McCord, cmccord@joneswalden.com; and Mark Gensburg, mgensburg@joneswalden.com), United States counsel to the Foreign Representative, on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Petition for Recognition or the Foreign Representative’s request for relief must appear at the Hearing at the time and place set forth above. Further, the Hearing may be adjourned from time to time without further notice other than an announcement in open court at the Hearing of the adjourned date or dates or any further adjourned hearing.

PLEASE TAKE FURTHER NOTICE that the Foreign Representative intends to raise issues pertaining to foreign law, specifically Canadian insolvency law including the CCAA, in connection with the Petition for Recognition: (i) recognizing the CCAA Proceeding as a foreign main proceeding pursuant to Chapter 15 of the Bankruptcy Code and the Foreign Representative as the Debtors’ foreign representative under Bankruptcy Code Sections 1509 and 1517; (ii) granting automatic relief pursuant to Bankruptcy Code section 1520; and (iii) granting other and additional relief pursuant to Bankruptcy Code sections 1507 and 1521(a) and (b).

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by the Foreign Representative without further notice. Copies of the Recognition Filings and the Scheduling Order may be obtained by contacting the undersigned United States counsel to the Foreign Representative.

Dated: July 24, 2023

JONES & WALDEN LLC

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