

**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 LEAVE TO FILE A REPLY THAT
EXCEEDS THE PAGE LIMITS ESTABLISHED BY THE
LOCAL RULES WITH INCORPORATED MEMORANDUM OF LAW**

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 Leave to File a Reply that Exceeds the Page Limits Established by the Local Rules with Incorporated Memorandum of Law* (the “**Page Limit Motion**”). In support of this Page Limit Motion, the Foreign Representative shows the Court as follows:

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.

1. Out of an abundance of caution, Foreign Representative respectfully moves this Court for leave to allow briefing exceeding the page limit set by Bankruptcy Local Rule (“**BLR**”) 7007-1(e) for replies to briefs filed in opposition to motions. In support, Foreign Representative states as follows:

2. On July 20, 2023, the Foreign Representative filed its *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* (DN 7) (the “**Petition for Recognition**”).

3. On July 21, 2023, this Court entered an order setting a hearing on the Petition for Recognition for August 14, 2023 at 1:30 P.M. (the “**Hearing**”).

4. On August 10, 2023, Hercules Film Investors I (US), Inc., (“**Hercules**”) filed an *Opposition to Motion of Foreign Representative for an Order Granting Certain Provisional Relief* (DN 29) (the “**Hercules Objection**”) in response to the Petition for Recognition.

8. Also on August 10, 2023, Hudson Private LP and Hudson Private Corp. (“**Hudson**”) filed their *Hudson Private LP and Hudson Private Corporation’s Response in Opposition to BRON Media Corp’s Omnibus Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code and Motion to Transfer Venue* (DN 30) (the “**Hudson Objection**”) in response to the Petition for Recognition, which also included a motion to transfer venue to the Southern District of New York.

9. Pursuant to BLR 7007-1(e), this Court has the discretion to allow replies in excess of the page limits.

10. Foreign Representative seeks to file a reply in support which responds to the Hercules Objection as well as the Hudson Objection, while also responding to a motion imbedded

into the Hudson Objection. As such, BLR 7007-1(e) applies to adversary proceedings and may potentially be inapplicable. However, out of an abundance of caution, Foreign Representative seeks permission to file a brief in excess of the page limits set out in BLR 7007-1 so that this Court can be properly briefed on the issues before the Court prior to the Hearing.

WHEREFORE for the foregoing reasons, Foreign Representative respectfully request that this Page Limit Motion be granted, and that Foreign Representative be granted leave to file a reply in support in excess of the page limits of BLR 7007-1(e).

Respectfully submitted this 14th day of August, 2023.

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