

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

In re:	Chapter 15
BRON Creative USA, Corp.	Case No. 23-56799
BRON Digital USA, LLC	Case No. 23-56801
BRON Life USA Inc. f/k/a BRON Legacy USA Inc.	Case No. 23-56802
BRON Media Holdings USA Corp.	Case No. 23-56798
BRON Releasing USA Inc.	Case No. 23-56803
BRON Studios USA Inc.	Case No. 23-56804
BRON Ventures 1, LLC	Case No. 23-56806
BRON Studios USA Developments Inc.	Case No. 23- 56805
Bakhorma, LLC	Case No. 23-56807
Drunk Parents, LLC	Case No. 23-56808
Fables Holdings USA, LLC	Case No. 23-56809
Fables Productions USA Inc	Case No. 23-56810
Gossamer Holdings USA, LLC	Case No. 23-56811
Gossamer Productions USA Inc.	Case No. 23-56812
Harry Haft Productions, Inc.	Case No. 23-56813
Heavyweight Holdings, LLC f/k/a Harry Haft Films, LLC	Case No. 23-56815
I Am Pink Productions, LLC	Case No. 23-56817
Lucite Desk, LLC	Case No. 23-56818
National Anthem Holdings, LLC f/k/a BCDC Holdings, LLC	Case No. 23-56819
National Anthem ProdCo Inc.	Case No. 23-56820
Oakland Pictures Holdings, LLC	Case No. 23-56821
Pathway Productions, LLC	Case No. 23-56823
Robin Hood Digital PC USA Inc.	Case No. 23-56824
Robin Hood Digital USA, LLC	Case No. 23-56825
Solitary Holdings USA, LLC	Case No. 23-56826
Surrounded Holdings USA LLC	Case No. 23-56827
Welcome To Me, LLC	Case No. 23-56828
Debtors in a Foreign Proceeding.	Joint Administration Requested.

**MOTION OF FOREIGN REPRESENTATIVE FOR
ENTRY OF AN ORDER AUTHORIZING AND DIRECTING JOINT
ADMINISTRATION OF CHAPTER 15 CASES FOR PROCEDURAL PURPOSES ONLY**

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”) which are the subjects of a reorganization proceeding (the “CCAA Proceeding”) commenced before the Supreme Court of British Columbia (the “Canadian Court”) under Canada’s *Companies’ Creditors Arrangement Act* (the “CCAA”), by and through its undersigned counsel, files this motion (the “Motion”) for the entry of an order, substantially in the form attached hereto as **Exhibit A**, authorizing and directing the joint administration of the above-captioned Chapter 15 cases (the “Chapter 15 Cases”) for procedural purposes only pursuant to Section 105(a) of Title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). In support of the Motion, the Debtors rely on the *Declaration of Aaron Gilbert in Support of the Debtors’ Chapter 15 Petitions and First Day Pleadings in Foreign Proceeding* (the “Gilbert Declaration”) filed concurrently herewith and incorporated herein by reference. In further support of the Motion, the Foreign Representative respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Recognition of a foreign proceeding and other matters under Chapter 15 of the Bankruptcy Code are core matters under 28 U.S.C. § 157(b)(2)(P).

2. The Foreign Representative, in its capacity as authorized foreign representative, consents to the entry of final orders or judgments by the Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with

Article III of the United States Constitution.

3. Venue is proper in this Court and this District pursuant to 28 U.S.C. § 1410.

4. The statutory predicate for the relief requested herein is Section 105(a) of the Bankruptcy Code. Relief is also warranted pursuant to Bankruptcy Rule 1015(b).

PROCEDURAL AND FACTUAL BACKGROUND

5. On July 19, 2023 (the “Petition Date”), each of the Debtors filed their respective Official Form 401 voluntary petitions for relief under Chapter 15 of the Bankruptcy Code (the “Petitions”). The detailed factual background relating to the Debtors and the commencement of the Petitions is set forth in the Gilbert Declaration.

RELIEF REQUESTED

6. By this Motion, the Foreign Representative seeks entry of an order authorizing and directing joint administration of these Chapter 15 Cases for procedural purposes only. Specifically, the Foreign Representative requests that the Court maintain one file and one docket for all of these Chapter 15 Cases under the case name of BRON Media Holdings USA Corp. and using the case number assigned to the same, and that these Chapter 15 Cases be administered under the caption as follows:

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FOR THE NORTHERN DISTRICT OF GEORGIA**

In re:

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

Chapter 15

Case No. 23-56798-pmb

Jointly Administered

7. The Foreign Representative further requests that the Court order that the foregoing caption shall satisfy the requirements set forth in the Bankruptcy Code and the Bankruptcy

Rules, including but not limited to Sections 342(a) and (c)(1) of the Bankruptcy Code.

8. The Foreign Representative also requests that an entry be made on the docket of the remaining Debtors to reflect the joint administration of these Chapter 15 Cases that is substantially similar to the following:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration of this Chapter 15 case with the Chapter 15 case of BRON Media Holdings USA Corp. Case No. 23-56798. All further pleadings and other papers filed in this case shall be filed in, and all further docket entries shall be made in, the docket of BRON Media Holdings USA Corp. Case No. 23-56798.

BASIS FOR RELIEF

9. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). The Debtors are “affiliates” as that term is defined under Section 101(2) of the Bankruptcy Code. *See* 11 U.S.C. § 101(2). Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court to grant the relief requested herein.

10. Section 105(a) of the Bankruptcy Code provides the Court with the power to grant the relief requested herein by permitting the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of the [Bankruptcy Code].” 11 U.S.C. § 105(a).

11. Joint administration is generally non-controversial, and courts in other Districts have routinely ordered joint administration in multiple related Chapter 15 cases. *See, e.g., In re Groupe Dynamite Inc.*, No. 20-12085 (CSS) (Bankr. D. Del. Sept. 9, 2020); *In re JustFly Corp.*, No. 20-11204 (JTD) (Bankr. D. Del. May 22, 2020); *In re The Aldo Group Inc.*,

No. 20-11060 (KBO) (Bankr. D. Del. May 8, 2020); *In re Spectra Premium Industries Inc.*, No. 20-10611 (BLS) (Bankr. D. Del. March 12, 2020).

12. The twenty-seven (27) debtor entities in these Chapter 15 Cases are “affiliates” as that term is defined in Bankruptcy Code Section 101(2). Given the integrated nature of the Debtors’ operations, joint administration of these Chapter 15 Cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders that will arise in these Chapter 15 Cases will affect each of the Debtors. The entry of an order directing joint administration of these Chapter 15 Cases will reduce fees and costs by avoiding duplicative filings and objections. Joint administration also will allow the Court, the Office of the United States Trustee for the Northern District of Georgia, and all parties in interest to monitor these Chapter 15 Cases with greater ease and efficiency.

13. Moreover, joint administration will not adversely affect the Debtors’ respective constituencies because this Motion requests only administrative, not substantive, consolidation of the Chapter 15 Cases. Parties in interest will not be harmed by the relief requested, but, instead, will benefit from the cost reductions associated with the joint administration of these Chapter 15 Cases. Accordingly, the Foreign Representative submits that the joint administration of these Chapter 15 Cases is in the best interests of the Debtors, their creditors, and all other parties in interest.

WHEREFORE, for the reasons set forth herein, the Foreign Representative respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other and further relief as is just and proper.

Dated: July 20, 2023.

JONES & WALDEN LLC

/s/ Cameron M. McCord

Cameron McCord

Georgia Bar No. 143065

Mark Gensburg

Georgia Bar No. 213119

Attorneys for Debtors

699 Piedmont Ave NE

Atlanta, Georgia 30308

(678) 701-9235

cmccord@joneswalden.com

mgensburg@joneswalden.com

*Counsel for Debtors and Foreign
Representative*

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

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**ORDER AUTHORIZING AND DIRECTING JOINT ADMINISTRATION
OF CHAPTER 15 CASES FOR PROCEDURAL PURPOSES ONLY**

UPON CONSIDERATION of the motion (the “Motion”)¹ of the Foreign Representative for entry of an order authorizing and directing the joint administration of the Debtors’ related Chapter 15 Cases; and the Court having considered and reviewed the Motion and the Chapter 15 Petitions and *all related documents filed contemporaneously therewith, including, but not limited to, the Declaration of Aaron Gilbert in Support of the Debtors’ Chapter 15 Petitions and First Day Pleadings in Foreign Proceeding*, including all facts specifically alleged and verified therein; and upon the record herein; and due and sufficient cause appearing therefor; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; this being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1401(1) and (3); and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest in these Chapter 15 Cases; and the Foreign Representative provided an adequate opportunity for a hearing on the Motion under the circumstances; it is hereby **ORDERED**

1. The Motion is **GRANTED**, as set forth herein.
2. The above-captioned Chapter 15 cases are consolidated for procedural purposes only and shall be jointly administered by the Court under the case of BRON Media Holdings USA Corp., Case No. 23-56798.
3. The caption of the jointly administered Chapter 15 Cases shall read as follows:

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

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Chapter 15

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Jointly Administered

4. The foregoing caption shall satisfy the requirements set forth in Sections 342(a) and (c)(1) of the Bankruptcy Code.

5. All original pleadings shall be captioned as set forth in paragraph 3, and all original docket entries shall be made in the case of BRON Media Holdings USA Corp. Case No. 23-56798.

6. An entry shall be made on the docket of each of the other Debtors' Chapter 15 Cases that is substantially similar to the following:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration of this Chapter 15 case with the Chapter 15 case of BRON Media Holdings USA Corp. Case No. 23-56798. All further pleadings and other papers filed in this case shall be filed in, and all further docket entries shall be made in, the docket of BRON Media Holdings USA Corp. Case No. 23-56798.

7. The Foreign Representative shall maintain, and the Clerk of the United States Bankruptcy Court for the Northern District of Georgia shall keep, one consolidated docket, one file, and one consolidated service list in these Chapter 15 Cases.

8. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 15 Cases.

9. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

END OF ORDER

Prepared and Presented by:

JONES & WALDEN LLC

/s/ Cameron M. McCord

Cameron McCord

Georgia Bar No. 143065

Mark Gensburg

Georgia Bar No. 213119

Attorneys for Debtors

699 Piedmont Ave NE

Atlanta, Georgia 30308

(678) 701-9235

cmccord@joneswalden.com

mgensburg@joneswalden.com

Counsel for Debtors and Foreign Representative