

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

In re:

Front Runner Productions, Inc., *et al.*,

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-50790-pmb

Jointly Administered

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

PLEASE TAKE NOTICE that on January 24 & 25, 2024, 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) in British Columbia, Canada, by the Foreign Representative’s undersigned United States counsel, filed an *Official Form Petition* for each of the Debtors, the *Omnibus Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Second Amended and Restated Initial Order, and (IV) Related Relief Under Chapter 15 of the Bankruptcy Code*, and the *Omnibus Motion of Foreign Representative, for an Order Granting Certain Provisional Relief* (together with all exhibits, declarations and other documents appended thereto or filed in connection therewith, the “Petitions for Recognition”) commencing Chapter 15 cases ancillary to the CCAA Proceeding and seeking (i) recognition of such foreign 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. 14] (the “Scheduling Order”), the Bankruptcy Court has scheduled a hearing on **February 27, 2024 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 Petitions 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 30303, United States of America, **on or before February 20, 2024 at 5:00 P.M. (Eastern Standard Time)** (the “Objection Deadline”); and (iii) served upon JONES & WALDEN LLC,

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.

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 Petitions 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 Petitions 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 Petitions for Recognition and the Scheduling Order may be obtained by contacting the undersigned United States counsel to the Foreign Representative.

Dated: February 1, 2024.

JONES & WALDEN LLC

/s/ Cameron M. McCord

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