

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

IN RE:	)	CASE NO. 23-56798-PMB
	)	
BRON MEDIA HOLDINGS USA CORP., et al.	)	CHAPTER 15
	)	
Debtor.	)	
_____	)	
HUDSON PRIVATE CORP.,	)	CONTESTED MATTER
	)	
Movant,	)	
	)	
v.	)	
	)	
BRON CREATIVE USA, Debtor,	)	
	)	
Respondent.	)	
_____	)	

**FIRST AMENDMENT TO HUDSON PRIVATE CORP.'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

COMES NOW Hudson Private Corp. (“Hudson” or “Movant”), and amends its Motion for Relief from Automatic Stay (the “Motion”) [Docket No. 75] filed on October 6, 2023, pursuant to Rules 4001 and 9014 of the Bankruptcy Rules and §362(d) of the Bankruptcy Code, and amends its request for relief from the automatic stay provided by §362(a) of the Bankruptcy Code to include funds received by Hudson from the Sheriff of Los Angeles County post-petition but which were received by the Sheriff in June of 2023. In support herein the Movant alleges as follows:

AMENDMENT

Hudson incorporates by reference all prior alleged facts and law as set forth in its Motion, and amends its Motion with the following:

12.

Pursuant to the Writ of Execution served on CPII by the Sheriff of Los Angeles County served a copy of the writ of execution and notice of levy on CPII, CPII caused funds to be delivered

on CPII's behalf to the levying officer certain of these funds on June 12, 2023 by two checks in the amount of \$329,417.00, and \$23,713.41, the total being \$353,106.41 (the "Additional Funds"). Notwithstanding the funds were received well before the Petition Date, these funds were not disbursed by check to counsel for Hudson until August 3, 2023.

13.

Movant is a secured creditor that lacks adequate protection, and BRON Creative has no equity in the California Funds, and such are not necessary to the Debtors' reorganization as the CCAA is pursuing a sale of Bron Media, inclusive of Bron Creative USA, but also under California law, the California Funds are not property of Bron. See *Cross Electric Co., Inc. v United States*, 664 F.2d 1218 (4th Cir. 1981); *In re Paul* 85 B.R. 850 (Bankr.E.D. Cal. 1988) and *In Re Nada*, Case No. 11-45176-WJL, 2011 WL 4591890 (Bankr. N.D. Cal. Oct. 2, 2011).

RELIEF REQUESTED

Movant seeks relief from the automatic stay under 11 U.S.C. § 362(d)(1) and (2), or, in the alternative, an Order of the Court finding the California Funds and the Additional Funds are not property of the Debtor Bron Creative USA.

WHEREFORE, Movant prays that the Court grant relief as follows:

- a) Enter an Order modifying the automatic stay of 11 U.S.C. § 362 to permit Movant to collect and maintain the California Funds and the Additional Funds and to apply such to Bron Creative's debt to Hudson; or
- b) Enter an Order finding the California Funds and the Additional Funds are not property of the Debtor;
- c) provide that any Order shall be immediately effective and enforceable upon its entry; and

- c) grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

MCBRYAN, LLC

/s/Louis G. McBryan

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Attorneys for Movant

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BRON CREATIVE USA, Debtor,	)	
	)	
Respondent.	)	
	)	

CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the foregoing ***FIRST AMENDMENT TO HUDSON PRIVATE CORP.'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY*** with the Clerk of Court using the CM/ECF system which will automatically send an e-mail notification of such filing to all parties and attorneys of record including the following:

Cameron M. McCord
Jones & Walden, LLC
699 Piedmont Avenue NE
Atlanta, GA 30308

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

This 24th day of October 2023.

MCBRYAN, LLC

/s/Louis G. McBryan
Louis G. McBryan, Georgia Bar No. 480993
lmcbryan@mcbryanlaw.com
Attorneys for Movant