

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

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

MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW Hudson Private Corp. (“Hudson” or “Movant”), pursuant to Rules 4001 and 9014 of the Bankruptcy Rules and §362(d) of the Bankruptcy Code, to request relief from the automatic stay provided by §362(a) of the Bankruptcy Code. In support herein the Movant alleges as follows:

JURISDICTION AND VENUE

1.

On or about July 19, 2023, Bron Media Corp.¹ (in its individual capacity, and as in its capacity as the Canadian Court-appointed and authorized foreign representative (the “Foreign

¹The 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

Representative”) filed petitions for relief under Chapter 15 of Title 11 for each of the Debtors. The Foreign Representative continues to serve as the court appointed foreign representative in the Canadian reorganization proceeding (the “CCAA Proceeding”) commenced under Canada’s Companies’ Creditors Arrangement Act and pending before the Supreme Court of British Columbia (the “Canadian Court”). Orders granting provisional relief pursuant to applicable sections of Chapter 15 (“Provisional Orders”) were entered in these cases on July 21, 2023 (Docket No. 15) and July 28, 2023 (Docket No. 23). A final hearing on recognition of the petitions was held August 14, 2023 (Docket No. 16). On August 15, 2023, the Court entered an Order Granting Foreign Representative’s 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 (Docket No. 37) (“Final Recognition Order”).

2.

This Court has jurisdiction over this case and this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1410.

BACKGROUND

3.

On September 21, 2022, Bron Creative confessed to judgment in favor of Hudson in the District Court of Clark County, Nevada for the sum of Five Million Dollars (\$5,000,000.00) plus interest and attorney’s fees (the “NV Judgment”). A copy of that Judgment is attached as **Exhibit A**.

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.

4.

On or about January 2, 2023, a judgment was entered in favor of Hudson against BRON Creative in the amount of \$7,254,614.59 recorded in the Supreme Court for the State of New York (the “NY Judgment”) based upon the Nevada Judgment. A copy of that Judgement is attached as **Exhibit B.**

5.

On November 8, 2022, the Los Angeles County Superior Court entered a \$6,995,640.48 judgment (the “CA Judgment”) in favor of Hudson and against Bron Creative USA, Corp. based upon the Nevada Judgment. A true and correct copy of that Judgment is attached hereto as **Exhibit C.** On December 23, 2022, the Los Angeles County Superior Court issued a writ of execution permitting the enforcement of the CA Judgment.

6.

Bron Creative is a registered Nevada Corporation that at the time the CA Judgment, NV Judgment and NY Judgment (collectively the “Judgments”) were recorded had offices in New York and California and a registered agent in Nevada.

7.

Movant is a secured creditor of Bron Creative USA based upon the recording of the Judgments.

8.

Bron Creative USA has a contractual right to receive a share of the revenue generated by several successful films that it co-financed with Columbia Pictures Industries, Inc. (CPII), whose parent company is Sony Pictures Entertainment, Inc. (SPE). On or about January 11, 2023, pursuant to the writ of execution issued by the Los Angeles County Superior Court, Hudson

instructed the Los Angeles County Sheriff to levy from CPII all monies, payments, rights of payment, and other property in which Bron Creative USA has an interest.

9.

On or about February 10, 2023, the Los Angeles County Sheriff's Department served CPII with notice of levy under writ of execution. Upon receipt of the notice of levy and related documents, SPE's counsel contacted Hudson's counsel and advised that CPII and Bron Creative USA entered into a number of co-financing and distribution deals for motion pictures pursuant to which Bron Creative USA receives periodic profits in connection with the co-financed titles, which payments are known as participation shares. Further, in compliance with the levy, SPE on behalf of CPII caused Bron Creative USA's participation share payments to be delivered to the Los Angeles County Sheriff's Department at various times.

10.

Under California law, a writ of execution creates a lien on the specific property levied. *Los Angeles Morris Plan Co. v. O'Day*, 52 Cal. App. 2d 356, 358 [126 P.2d 148, 149] (2d Dist. 1942). A levy carried under a writ of execution provides the effective date of an execution lien on the property. Cal. Code of Civil Procedure § 701.010, subd. (a), (b). *Nordstrom v. Corona City Water Co.*, 155 Cal. 206, 212-213 [100 P. 242, 245] (1909). *Steineck v. Haas-Baruch Co.* 106 Cal.App. 228, 231-232 [288 P. 1104, 1106] (1930). Movant's lien attaches to the proceeds of the contracts between CPII and Bron Creative USA.

11.

Prior to the Petition Date, the Sheriff of Los Angeles County served a copy of the writ of execution and notice of levy on CPII, causing funds to be delivered on CPII's behalf to the levying officer.. Certain of these funds, in the amount of \$390,354 while delivered by check to the Los

Angeles County Sheriff's Department on or about July 13, 2023 (pre-petition), underwent a requisite clearing process by the Sheriff's Department and, therefore, are still held post-petition. The Sheriff, therefore, is holding the sum of \$390,354.00 awaiting instructions for the release of these funds (the "California Funds").

12.

Movant is not just 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 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

13.

Movant seeks relief from the automatic stay under 11 U.S.C. § 362(d)(1) and (2), or an Order of the Court finding the California 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 to apply such to Bron Creative's debt to Hudson; or
- b) Enter an Order finding the California 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

Louis G. McBryan, Georgia Bar No. 480993

6849 Peachtree Dunwoody Road

Building B-3, Suite 100

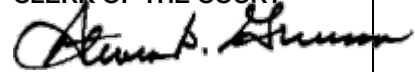
Atlanta, GA 30328

Telephone (678) 733-9322

lmc Bryan@mcbryanlaw.com

Attorneys for Movant

Electronically Filed
9/21/2022 12:37 PM
Steven D. Grierson
CLERK OF THE COURT



JUDG
MCNUTT LAW FIRM, P.C.
Daniel R. McNutt, Esq., Bar No. 7815
Matthew C. Wolf, Esq., Bar No. 10801
11441 Allerton Park Drive, #100
Las Vegas, Nevada 89135
Tel.: (702) 384-1170 / Fax.: (702) 384-5529
drm@mcnuttlawfirm.com
mcw@mcnuttlawfirm.com
Counsel for Plaintiff Hudson Private Corp.

EXHIBIT

A

DISTRICT COURT

CLARK COUNTY, NEVADA

HUDSON PRIVATE CORP.,

Plaintiff,

BRON CREATIVE USA, CORP.,

Defendant.

Case No.: A-22-858612-C
Dept. No.: 13

CONFESSION OF JUDGMENT

Pursuant to NRS 17.090, NRS 17.100, and NRS 17.110, Plaintiff Hudson Private Corp., by and through their attorneys, McNutt Law Firm, P.C., hereby requests the clerk of the court to enter the judgment attached hereto as Exhibit 1 against Defendant Bron Creative USA, Corp.

DATED September 21, 2022.

MCNUTT LAW FIRM, P.C.

/s/ Dan McNutt

Daniel R. McNutt, Esq., Bar No. 7815
Matthew C. Wolf, Esq., Bar No. 10801
11441 Allerton Park Drive, #100
Las Vegas, Nevada 89135
Counsel for Plaintiff Hudson Private Corp.

Exhibit 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X	:	Index No.
HUDSON PRIVATE CORP.,	:	
	:	
Plaintiff,	:	AFFIDAVIT OF CONFESSION
	:	OF JUDGMENT
	:	
v.	:	
	:	
BRON CREATIVE USA, CORP.,	:	
	:	
Defendant.	:	
-----X	:	

JASON CLOTH, hereby affirms pursuant to CPLR 2106(b):

1. I am a principal of defendant Bron Creative USA, Corp. ("Bron Creative").
2. I am duly authorized to make this affidavit on behalf of Bron Creative, which makes this affidavit pursuant to the provisions of Section 3218 of the Civil Practice Law and Rules of the State of New York.
3. Bron Creative confesses judgment and authorizes the entry of judgment in favor of Hudson Private Corp. ("Hudson") against Bron Creative in the total sum of up to Five Million Dollars (\$5,000,000), plus contractual interest at the rate of 15% per annum from January 23, 2020 through the date of collection, plus Hudson's reasonable attorneys' fees and expenses incurred in connection with the filing and enforcement of this Confession of Judgment, minus any payments that Bron Creative makes to Hudson pursuant to the Settlement Agreement, dated as of July 8, 2022 by and between Hudson and West Ventures LLC on the one hand, and Bron Creative on the

other hand (the "Settlement Agreement").

4. This confession of judgment is for a debt justly due to Hudson arising out of a default of the Settlement Agreement. Pursuant to the Settlement Agreement, Hudson is authorized to enter this confession of judgment against Bron Creative as a result of such default.

I affirm this 11 day of July 2022, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that I am physically located outside the geographic boundaries of the United States, Puerto Rico, the United States Virgin Islands, or any territory or insular possession subject to the jurisdiction of the United States, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

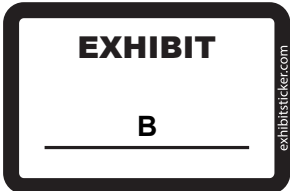
BRON CREATIVE USA, CORP.

A handwritten signature in black ink, appearing to read "Jason Cloth", is written over a horizontal line.

By: Jason Cloth

Title: Principal

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK



----- X
HUDSON PRIVATE CORP.,

:
: Index No.: 653798/2022
:

Plaintiff,

:
: **JUDGMENT**
:

-against-

BRON CREATIVE USA, CORP.,

Defendant.
----- X

UPON reading and filing the Summons, dated October 14, 2022, the Notice of Motion for Summary Judgment in Lieu of Complaint, dated October 14, 2022; the Affidavit in Support of Motion for Summary Judgment in Lieu of Complaint, sworn to by Christopher Conover on October 14, 2022, and exhibits thereto; the Plaintiff’s Memorandum of Law in Support of Its Motion for Summary Judgment in Lieu of Complaint, dated October 14, 2022; the Affirmation in Support of Motion for Summary Judgment in Lieu of Complaint, affirmed to by Kevin Fritz on December 29, 2022, and exhibit thereto; the Decision and Order on Motion of the Honorable Suzanne J. Adams, dated January 3, 2023; and upon all other pleadings and proceedings had herein,

NOW, on motion of Meister Seelig & Fein PLLC, attorneys for plaintiff Hudson Private Corp., it is

ADJUDGED that plaintiff Hudson Private Corp. with a place of business at 15 East Central Avenue, Pearl River, New York 10965, shall have judgment and recover against defendant Bron Creative USA, Corp., with an address at 345 N. Maple Drive, Suite 294, Beverly Hills, California 90210, the principal amount of \$5,000,000.00, plus interest, at the rate

of 15% per annum from January 23, 2020, as calculated by the Clerk, which amounts to
\$ **2,254,109.59**, plus costs and disbursements of this action as taxed by the Clerk,
which amounts to \$ **505.00**, for a total judgment in the amount

X \$ **7,254,614.59**, and that Plaintiff ~~shall~~ have execution thereon.

Judgment signed this 24th day of Jan. 2023

Milton Adair Tinsley
CLERK

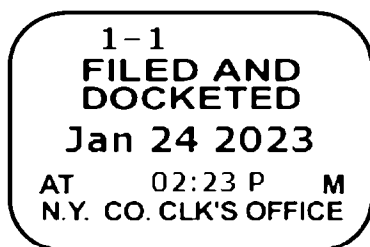


22 653798

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
HUDSON PRIVATE CORP., :
 : Index No. 653798/2022
 :
Plaintiff, :
 :
- against - :
 :
BRON CREATIVE USA, CORP., :
 :
Defendant. :
 :
----- X

JUDGMENT



MEISTER SEELIG & FEIN PLLC
Attorneys for Plaintiff
Hudson Private Corp.
125 Park Avenue, 7th Floor
New York, New York 10017
Tel: (212) 655-3500

TO: Service of a copy of the within is hereby admitted.

Dated: _____

Attorney(s) for _____

State of New York, County of

ss.: Index No. 653798/2022

being duly sworn, deposes and says; that deponent is not a party to the action, is over 18 years of age and resides at That on deponent served the within bill of costs and notice of taxation on attorney(s) for herein, at his/her office at during his/her absence from said office
~~strike out either (a) or (b)~~

(a) by then and there leaving a true copy of the same with his/her clerk; partner; person having charge of said office.

(b) and said office being closed, by depositing a true copy of same, enclosed in a sealed wrapper directed to said attorney(s), in the office letter drop or box.

Sworn to before me on

State of New York, County of

ss.:

being duly sworn, deposes and says; that deponent is not a party to the action, is over 18 years of age and resides at That on deponent served the within bill of costs and notice of taxation on attorney(s) for at the address designated by said attorney(s) for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in a post office—official depository under the exclusive care and custody of the United States Postal Service within New York State.

Sworn to before me on

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

HUDSON PRIVATE CORP.,

Plaintiff,

- against -

BRON CREATIVE USA, CORP.,

Defendant.

***Bill of Costs
and Notice of Taxation***

Please Take Notice that the within is a true copy of the items of costs and disbursements in the within action *taxed** and that the same will be taxed* by the Clerk of Court, at his/her office in the courthouse thereof on at A.M. of that day—and the amount inserted in the judgment.
Yours etc.

Meister Seelig & Fein PLLC
Attorney(s) for Plaintiff

To Herrick, Feinstein LLP
2 Park Avenue
New York, New York 10016
Attorney for Defendant

FILED
Jan 24 2023
NEW YORK
COUNTY CLERK'S OFFICE

Service of the within bill of costs and notice of taxation is hereby admitted on

Attorney(s) for

* Strike out one (CPLR §8402, 8403)

Dated: New York, New York
January 9, 2023

/s/ Kevin Fritz
Kevin Fritz, Esq.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp FILED Superior Court of California County of Los Angeles NOV 08 2022 Sherri R. Carter, Executive Officer/Clerk By: <u>Kathy Parenteau</u> Deputy CASE NUMBER: 22SMCP00542
COURTHOUSE ADDRESS: 1725 Main Street, Santa Monica, CA 90401		
PLAINTIFF/PETITIONER: Hudson Private Corp.		
DEFENDANT/RESPONDENT: Bron Creative USA, Corp.		
JUDGMENT BASED ON SISTER-STATE JUDGMENT (Code Civ. Proc., § 1710.25)		

An application has been filed for entry of judgment based upon judgment entered in the State of:
Nevada

Pursuant to Code of Civil Procedure section 1710.25, judgment is hereby entered in favor of plaintiff/judgment creditor

Hudson Private Corp.

and against defendant/judgment debtor

Bron Creative USA, Corp.

For the amount shown in the application remaining unpaid under said Judgment in the sum of \$ 5,000,000.00, together with interest on said Judgment in the sum of \$ 1,995,205.48, Los Angeles Superior Court filing fees in the sum of \$ 435.00, costs in the sum of \$ 6,995,640.48, and interest on said judgment accruing from the time of entry of Judgment at the rate provided by law.

SHERRI R. CARTER, Executive Officer/Clerk

Dated: 11/08/2022

By: K. Parenteau
Deputy Clerk

CERTIFICATE OF MAILING

I, the below named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the **Judgment Based on Sister-State Judgment (Code Civ. Proc., § 1710.25)** upon each party or counsel named below by depositing in the United States mail at the courthouse in _____, California, one copy of the original filed herein in a separate sealed envelope for each address as shown below with the postage thereon fully prepaid.

Ana Vasquez
Chassman & Seelig LLP
1250 Sixth Street, Suite 403
Santa Monica, CA 90401

SHERRI R. CARTER, Executive Officer/Clerk

Dated: 11/15/2022

By: K. Parenteau
Deputy Clerk

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Santa Monica Courthouse 1725 Main Street, Santa Monica, CA 90401		FILED Superior Court of California County of Los Angeles 11/15/2022 Sherri R. Carter, Executive Officer / Clerk of Court By: <u>K. Parenteau</u> Deputy
PLAINTIFF/PETITIONER: Hudson Prlvate Corp		
DEFENDANT/RESPONDENT: Bron Creative USA, Corp.		
CERTIFICATE OF MAILING		CASE NUMBER: 22SMCP00542

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Judgment Based on Sister-State Judgment upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Santa Monica, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

ANA VASQUEZ
1250 Sixth Street 403
Santa Monica, CA 90401

Sherri R. Carter, Executive Officer / Clerk of Court

Dated: 11/15/2022

By: K. Parenteau
Deputy Clerk

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

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

NOTICE OF HEARING

PLEASE TAKE NOTICE that Hudson Private Corp. has filed a Motion for Relief from Automatic Stay with the Court seeking an order to permit Movant to collect and maintain the California Funds and to apply such to Bron Creative USA's debt to Hudson Private Corp.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the **Motion** at **1:00 p.m. on October 30, 2023, in Courtroom 1202, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-in and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on the Court's website. Please also review the "Hearing Information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge's webpage.

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk

before the hearing. The address of the **Clerk's Office is Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, Atlanta Georgia 30303**. You must also mail a copy of your response to the undersigned at the address stated below.

If a hearing on the Motion cannot be held within thirty (30) days, Movant waives the requirement for holding a preliminary hearing within thirty days of filing the Motion and agrees to a hearing on the earliest possible date. Movant consents to the automatic stay remaining in effect until the Court orders otherwise.

Respectfully submitted,

MCBRYAN, LLC

/s/Louis G. McBryan

Louis G. McBryan, Georgia Bar No. 480993
6849 Peachtree Dunwoody Road
Building B-3, Suite 100
Atlanta, GA 30328
Telephone (678) 733-9322
lmcbryan@mcbryanlaw.com
Attorneys for Movant

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

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

CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the foregoing *Notice of Hearing and Motion for Relief from Automatic Stay* with the Clerk of Court using the CM/ECF system which will automatically send an e-mail notification of such filing to the parties or attorneys of record. I have also on this day caused a copy of the pleading to be placed in the first-class United States mail, postage prepaid, addressed to the following recipients not participating in the CM/ECF system as follows:

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 6th day of October 2023.

MCBRYAN, LLC

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