

**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 EXPEDITED HEARING

COMES NOW BRON Media Corp.¹ (“BRON”), individually and 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 Expedited Hearing* (the “Hearing Motion”). In support of the Hearing Motion, the Foreign Representative shows the Court as follows:

1. On July 19, 2023, each jointly administered Debtor commenced their respective Chapter 15 case (collectively, the “Cases”) by the filing of a *Chapter 15 Petition for Recognition of a Foreign Proceeding*, along with an accompanying *Omnibus Verified Petition for (I)*

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.

Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of The Bankruptcy Code (Docket No. 7) (the “Petitions”).

2. On August 15, 2023, after notice and hearing, the Court issued its *Order Granting 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* (Docket No. 37), which granted the Petitions (the “Recognition Order”).

3. On October 6, 2023, Foreign Representative filed its *Notice of Filing of (I) Notice of Application, (II) Affidavit of Aaron Gilbert, and (III) Draft Order Made After Application* (Docket No. 76) (the “Stay Application”). The Stay Application set forth the *Notice of Application*, which was filed by Debtors in their *Companies’ Creditors Arrangement Act* insolvency proceedings (the “Canadian Proceeding”) under the supervision of the Supreme Court of British Columbia (the “Canadian Court”). The Stay Application sought to extend the Canadian stay—previously set to expire on October 18, 2023—to and including November 8, 2023.

4. On October 11, 2023, at 12:45 P.M. EST, the Canadian Court held a hearing on the Stay Application (the “Canadian Stay Hearing”).

5. Upon the conclusion of the Canadian Stay Hearing, on October 12, 2023, the Canadian Court entered a *Petitioners Order Made After Application*, which extended the Stay Period to and including November 8, 2023 (the “Canadian Stay Extension Order”).

6. On October 12, 2023, Foreign Representative filed its *Motion to Extend Automatic Stay* (Docket No. 78) (the “Stay Motion”), which asks that this Court recognize the Canadian Stay Extension Order and extend the American stay in this case to and including November 8, 2023.

7. 11 U.S.C. §§ 1501(a)(1), 1507, 1520(a), 1521(a), 1522(a), and 1525(a) permit the Court to grant relief upon the request of a Chapter 15 foreign representative for an extension of the automatic stay in these ancillary Chapter 15 Cases.

8. The relief requested in the Stay Motion is urgently needed in these Cases. Should the stay elapse in these Cases on October 18, 2023, creditors may quickly begin to circumvent the Canadian Proceedings by picking apart Debtors' American assets. Such a disorganized liquidation would derail the presently pending Canadian Proceeding.

9. Foreign Representative requests the Court hold an expedited hearing on the Stay Motion on or before October 17, 2023, so that the Court may evaluate the relief being sought in the Motion prior to October 18, 2023.

WHEREFORE, the Foreign Representative respectfully requests that this Court grant this Hearing Motion, shorten any applicable notice period, schedule an expedited hearing on the Stay Motion on or before October 17, 2023, and grant such other relief as may be just and proper.

RESPECTFULLY SUBMITTED this 12th day of October, 2023.

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